

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO DOUGLAS F.
CARLSON INTERROGATORIES TO WITNESS KINGSLEY
(DFC/USPS-T10-17, 22 and 23)
(April 6, 2000)

The United States Postal Service hereby objects to Douglas F. Carlson interrogatories DFC/USPS-T10-17, 22 and 23, directed to witness Kingsley, which were posted on the Commission's web page after the March 23 close of discovery. Despite the apparent late filing, responses will be provided to the interrogatories with the exception of the three discussed below, which are objected to on the basis of relevance.

DFC/USPS-T10-17 states:

- a. Please confirm that the fluorescent RBCS ID tag contains four digits that correspond to the AFCS or OCR machine number.
- b. Please confirm that two of the four digits in the RBCS ID tag are a number that corresponds to the performance cluster in which the machine is located.
- c. Please provide a list indicating the number of each performance cluster for purposes of machine numbers in RBCS ID tags. (For example, machines in the Oakland performance cluster use performance cluster "05.")
- d. Please provide any documents that explain how to decode RBCS ID tags or explain the concept underlying derivation of the bar code. (For example, Postnet bar codes are binary codes using the 74210 sequence.)

There certainly are any number of reasons why Mr. Carlson might desire to obtain the information requested in the interrogatory. Unfortunately, they do not appear to have the remotest bearing on any issue in this proceeding.

DFC/USPS-T10-22 and 23 provide:

DFC/USPS-T10-22. Please provide a list of facilities that have TMS.

DFC/USPS-T10-23. Please provide a list of offices using the ES-3 bar-coding system.

Again, the interrogatories appear to be motivated by something other than a desire to enhance the record with relevant information. The Postal Service could provide numerous lists of the facilities that have or do not have all sorts of equipment, or that follow or do not follow all sorts of practices. What bearing does any of this have on this proceeding?

Mr. Carlson, once again, appears to be engaged in a fishing expedition for reasons unrelated to setting domestic rates and fees. As such, his detailed questions pose the very real danger of causing the Postal Service, other parties and the Commission to be distracted from the important issues that need to be decided in this proceeding.

Neither witness Kingsley nor anyone else at the Postal Service should be required to respond to Mr. Carlson's questions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

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April 6, 2000