

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

APR 11 4 27 PM '00

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 POSTCOM INTERROGATORIES  
(POSTCOM/USPS- 6(a,b) AND 7(a,b))

The United States Postal Service hereby provides notice of its objection to the following PostCom interrogatories filed on March 23, 2000:

PostCom/USPS-6(a,b) and 7(a,b).

Interrogatory 6 refers to Figure 1 on page 7 of USPS Library Reference I-192, the Address Deficiency Study. Figure 1 consists of a Table depicting seven different types of address deficiencies and their relative proportions among 16,000 First-Class Mail and Standard (A) Mail letters sampled for purposes of the study. For purposes of developing Figure 1, the 16,000 letter mail pieces were not identified by class or rate category. Subparts (a) and (b) of PostCom/USPS-6 request that the Postal Service complete tables equivalent to Figure 1 for (a) Standard (A) prebarcoded letters, and (b) Standard (A) letters that are not prebarcoded, respectively.

Interrogatory 7 refers to Appendix C on page 15 of the Study. That Appendix contains more detailed address deficiency information for the aforementioned 16,000 mail pieces and divides them generally by First-Class Mail and Standard Mail.<sup>1</sup> Interrogatory 7 asks for a version of Appendix C using only data for (a) Standard (A) prebarcoded letters and (b) Standard (A) letters that are not prebarcoded.

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<sup>1</sup> No disaggregation of the pieces within each mail class was performed for purposes of the Study.

The Postal Service objects to these interrogatories because they would impose an undue burden. In order to further disaggregate the data reflected in Figure 1 and Appendix C, the Postal Service would either have enter into a new contract with Price Waterhouse to examine the 16,000 xerox copies of the sample mail pieces to determine which ones were Standard (A) prebarcoded letters or Standard (A) letters that are not prebarcoded. It is estimated that this would require an expenditure of approximately \$10,000 and take approximately four work-weeks to manually examine each mail piece duplicate and record the number of Standard (A) prebarcoded and non-prebarcoded pieces with each of the various deficiencies listed in Figure 1 and Appendix C, in order to respond to these interrogatories.

As there are no cost data associated with the Address Deficiency Study, the value of a further breakdown by rate category for each deficiency type would be of little, if any value to the issues in this proceeding. The burden of the task of disaggregating the data in Figure 1 and Appendix C far outweighs any value that such information could bring.

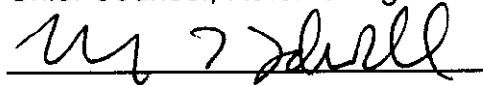
Accordingly, the Postal Service objects to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

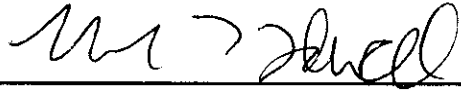


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
April 11, 2000

**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.

A handwritten signature in black ink, appearing to read "M. T. Tidwell", is written over a horizontal line.

Michael T. Tidwell

April 11, 2000