

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

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF UNITED PARCEL SERVICE
UPS/USPS-T1-77
(April 24, 2000)

On April 13, 2000, United Parcel Service (UPS) filed a follow-up interrogatory to the supplemental institutional responses to interrogatories UPS/USPS-T1-18, 22, 25 and 26, regarding variables not relied upon by the TRACS system but which appear in upstream data systems on which TRACS relies. Each of the institutional responses referenced a file in USPS-LR-I-288. The upstream data systems are ones used to run core functions of the Postal Service, and are accordingly viewed as containing commercially sensitive information regarding how that business should be run. In pertinent part, UPS/USPS-T1-77 states, "Provide a full description of each variable in Library Reference USPS-LR-I-288." Information already provided includes descriptions of the variables in question taken from the computer systems documentation for those systems; as such, this interrogatory appears to indicate that UPS does not find the included descriptions as sufficient. Regardless of their sufficiency for UPS' purposes, they are sufficient for the Postal Service's purposes and constitute the descriptions of those variables upon which the Postal Service relies. The services of a contractor would be required to investigate and develop more complete documentation. The Postal Service objects to any such requirement on the grounds of burden, commercial sensitivity, attenuated relevance, and materiality. Moreover, the Postal Service is quite unable to quantify the specific burden involved as UPS has yet to identify its unique

documentation requirements. Any burden associated with developing documentation suitable only for UPS purposes, when descriptions of the variables have already been provided and when those variables simply are not used in developing information for the Postal Service's direct case would constitute an unwarranted fishing expedition.

The Postal Service has been able to identify only one potentially responsive type of information that now exists and could be provided: of the 104 variables on the ACSS Master File, system documentation indicates the values that 11 of those variables can take on. However, that information being commercially sensitive, protective conditions are necessary.

The Postal Service accordingly objects to interrogatory UPS/USPS-T1-77 on the grounds of commercial sensitivity, burden, relevance and materiality, but nonetheless notes that some additional information could be provided if protective conditions are established.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Kenneth N. Hollies

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.

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