

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 UNITED STATES POSTAL SERVICE TO INTERROGATORY OF  
UNITED PARCEL SERVICE AND UPS/USPS-12A-15, 35; RESPONSE TO UNITED  
PARCEL SERVICE MOTION TO COMPEL RESPONSES TO UPS/USPS-12A-15; AND  
RESPONSE OF UNITED STATES POSTAL SERVICE TO MOTION  
OF UNITED PARCEL SERVICE TO COMPEL PRODUCTION OF  
INFORMATION AND DOCUMENTS IN INTERROGATORY UPS/USPS-6 OR,  
IN THE ALTERNATIVE TO EXTEND DISCOVERY DEADLINE ON BRPW  
PARCEL POST ESTIMATES  
(May 5, 2000)

The United States Postal Service hereby objects to United Parcel Service (UPS) interrogatories UPS/USPS-12A-15<sup>1</sup> filed on April 14, 2000 and UPS/USPS-35 filed on April 20. On May 2, 2000, UPS also filed motions to compel responses to UPS/USPS-12A-15. Because of the substantive overlap and many efforts by UPS to seek electronic information linking postage statements and BRPW records, this document also addresses the UPS motion to compel regarding UPS/USPS-6, filed April 28, 2000.

Interrogatories UPS/USPS-6, 12A-15 and 35 constitute a series of ultimately redundant attempts by UPS to require the production of all information related to the roll-up of information from postage statements through the PERMIT System, CBCIS, to

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<sup>1/</sup> The Postal Service indicated its intention of filing an objection to these interrogatories via filing of a notice to that effect on April 24, 2000. What originally was labeled "12" was re-labeled "12A" via errata filed April 27, 2000. The Postal Service filed a similar notice with respect to UPS/USPS-35 on May 1, 2000.

the BRPW results reported by it for use in the base year.<sup>2</sup> The Postal Service has previously explained variously why this information is commercially sensitive, may not be available in the form UPS would prefer, would be unduly burdensome to produce, has been used for ratemaking purposes for many years,<sup>3</sup> and is generally deemed reliable business records. The Postal Service has accordingly filed objections to UPS' various interrogatories on these and other grounds.<sup>4 5</sup> This pleading incorporates by reference the pleadings identified in footnote four, and because of the substantial substantive overlap among interrogatories UPS/USPS-6, UPS/USPS-12A-15, UPS/USPS-T5-35,

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<sup>2/</sup> UPS' efforts to get at this information began with UPS/USPS-6(a): "Provide all programs, documents, analyses and any other information used to aggregate each postage statement transaction for each record provided as part of LR-I-194." Similarly, UPS/USPS-12(b) states, "Provide the PERMIT data for all Parcel Post for FY1998 which is transmitted by each district in the form of the 'transaction file with VIP codes.'" UPS/USPS-14(a) seeks, "The PERMIT System raw data extracts for PQ2, FY 1997." UPS/USPS-35 asks, "Is postage statement-level data for Parcel Post FY1998 available in electronic format at one centralized location?" The Postal Service has consistently maintained its objection to UPS' repeated efforts, starting with Partial Objections of United States Postal Service To Interrogatories of United Parcel Service, UPS/USPS-T5-6(a), -7(b), -9(a), -12 and -16 (February 22, 2000) at 2-3.

<sup>3/</sup> This is why the information regarding the PERMIT System was filed as Category 1 library references. See USPS-LR-I-44 through 48.

<sup>4/</sup> See Response of United States Postal Service to Objection of United Parcel Service to Admission into Evidence Testimony of Witnesses Hunter and Pafford, as Supplemented, and to Motion of United Parcel Service to Compel Production of Information and Documents Or, in the Alternative, to Strike Testimony (April 24, 2000); Partial Objections of United States Postal Service To Interrogatories of United Parcel Service, UPS/USPS-T5-6(a), -7(b), -9(a), -12 and -16 (February 22, 2000).

<sup>5/</sup> On Friday, April 28, UPS filed its Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatory UPS/USPS-6 or, in the Alternative, to Extend Discovery Deadline on BRPW Parcel Post Estimates; on Tuesday, May 2, it filed a motion to compel responses to UPS/USPS-12A-15.

UPS/USPS-T5-58(b-c), and UPS/USPS-T5-87, they should be considered together rather than in isolation from one another.<sup>6</sup>

The material that follows: 1) states the objections based on timeliness; 2) identifies the burden associated with providing a limited affirmative response to UPS' repeated inquiries into layers of data underlying BRPW; and 3) provides greater detail regarding UPS/USPS-6, UPS/USPS-12A-15, and UPS/USPS-T5-35.

#### Timeliness

Interrogatories **UPS/USPS-12A-15** focus upon USPS-LR-I-279, PERMIT System Data Validation Study, Filed in Response to UPS/USPS-T5-43. UPS/USPS-T5-43, which followed upon UPS/USPS-T5-21, stated:

Refer to your answer to UPS/USPS-T5-21, where you state that "... data validation studies are periodically undertaken to verify alignment of the data fields and source documents." Provide copies of all such studies that were undertaken during or with respect to FY1998.

From the wording of this question, UPS was clearly on notice of the existence of data validation studies of which USPS-LR-I-279 is an example when it propounded UPS/USPS-T5-43, and was clearly capable of asking for underlying materials as UPS/USPS-12A-14 now request.<sup>7</sup> Moreover, the fact that UPS did not propound these interrogatories as follow-up to witness Hunter implicitly recognizes that they are not

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<sup>6/</sup> UPS never sought to compel a response to UPS/USPS-6(a), although after discussions among counsel, the Postal Service did file the electronic BRPW input and output files under protective conditions in USPS-LR-I-194. The Postal Service objected to UPS/USPS-T5-58(b-c) and 87 on April 3, 2000. Thereafter, UPS filed its motion to compel responses to these and two interrogatories on April 17; this motion sought in the alternative that portions of the RPW testimony be struck, thereby supplementing UPS' objection to the admission of the RPW witnesses' testimony which was filed the day before their appearances on the stand. The Postal Service consolidated response to the objection, motion to strike, and motion to compel was then filed on April 24.

<sup>7/</sup> This is exactly what UPS has repeatedly done. See, e.g., UPS/USPS-T5-6, 23, 24, 25, and 56. None of its pleadings attempt to distinguish this situation from those.

proper follow-up. Interrogatories UPS/USPS-12A-15 are thus not follow-up and having been filed after the close of discovery on the Postal Service direct case they also are untimely.

**UPS/USPS-35** asks about postage statement level FY 1998 Parcel Post data underlying the PERMIT system that is stored in one location or, in the alternative, details about distributed storage. This interrogatory is late, for all of the reasons explained above and in the Postal Service objection to a similar interrogatory, **UPS/USPS-6**.<sup>8</sup>

In its Objection to **UPS/USPS-6**, the Postal Service identified a number of recent P. O. Rulings interpreting Rule 2(e), the direct ancestor of Rule 25(a), as being available only when participants seek to rebut participants other than the Postal Service. Otherwise, the deadline for discovery would have no meaning. In its Motion to Compel a response to **UPS/USPS-6** ("Compel 6"), at 8, UPS dismisses these rulings as "dicta" – which they plainly are not. The distinction between Rule 2(e) discovery used to rebut the Postal Service direct case, as opposed to rebutting the direct cases of participants was determinative in P.O. Ruling Nos. R97-1/85 and 1/89.

P.O. Ruling No. R97-1/85 addressed the very same fact pattern at issue here. In the controversy addressed by P.O. Ruling No. R97-1/85, the participant filed the discovery request on December 1, 1997, in the window after the close of discovery on the Postal Service, but before submission of participants' cases in chief.<sup>9</sup>

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<sup>8/</sup> See United States Postal Service Objection to Interrogatory of United Parcel Service **UPS/USPS—6** (April 17, 2000).

<sup>9/</sup> Specifically, the discovery request was filed on December 1, more than two weeks after the close of discovery on the Postal Service (November 14, 1997) and almost one month prior to the filing of intervenors' direct cases and rebuttal to the Postal Service (December 30, 1997). See P.O. Ruling No. R97-1/55; P.O. Ruling No. R97-1/85.

The Presiding Officer ruled that such discovery was impermissible under Rule 2E:

The Commission adopted Rule 2E to enable a participant to obtain information available only from the Postal Service for the purpose of developing rebuttal testimony. However, it is generally not available *for the purpose of developing testimony to rebut the direct case of the Postal Service*. See Presiding Officer's Ruling MC96-3/36 at 2. If Rule 2E were available for this purpose, the discovery cutoff date would have little meaning.

P.O. Ruling No. R97-1/85 at 3 (emphasis added). Similarly, in P.O. Ruling No. R97-1/89, the Presiding Officer explained:

the case must move forward with deliberate speed as we are operating on a compressed schedule. Therefore, discovery cutoff dates must be respected and Special Rule 2.E. will continue serve the limited purpose of enabling intervenors to obtain certain information from the Postal Service for the purpose of rebutting other intervenors' cases.

P.O. Ruling No. R97-1/89 at 3 (citing P.O. Ruling R97-1/85 at 3-4; P.O. Ruling MC96-3/36 at 2). These rulings derived from prior rulings, which held that discovery under the predecessor to Rule 25(a) "is limited to when a participant needs data available only from the Postal Service in order to *prepare testimony to rebut participants other than the Postal Service*." P.O. Ruling No. MC96-3/36 at 3 (emphasis added). Presiding Officer's Ruling No. MC96-3/21 similarly explained that:

Rule 2.E was generally intended to extend the otherwise applicable discovery period for information that can be obtained only from the Postal Service that is needed to prepare *rebuttal testimony*.

P.O. Ruling No. MC96-3/21 at 2 (emphasis added). Rule 25(a) memorializes the substance of these rulings by explicitly providing that discovery on the Postal Service for data or information is only available for the "development of rebuttal testimony." Rule 25(a); see also PRC Order No. 1284.

UPS also tries to distinguish the P. O. Rulings on the grounds that it can foresee the direct case to be filed by Parcel Shippers based upon a supposed argument formulated as an interrogatory. Compel 6 at 4-5. Parcel Shippers has not filed a direct case, and it is free to argue whatever it wants; the possible existence of an argument inferred from an interrogatory is no basis for overturning the substantial body of Commission precedent regarding the proper application of Rule 25(a). To rule otherwise would essentially nullify the Commission's March 23, 2000 deadline for discovery on the Postal Service direct case.

UPS further claims (Compel 6 at 6) that the time period between the end of discovery and the filing of intervenors' direct cases would unnecessarily waste time by staying discovery for two months. The Postal Service submits that the schedule in a rate case is given careful consideration and that it appropriately balances a variety of competing factors. The pace of pleadings in this case has waned only somewhat since the close of discovery, indicating that the volume of follow-up interrogatories together with necessities for other types of pleadings are quite substantial during what UPS portrays as down time. More critically, the witnesses (accompanied in the hearing room by their attorneys) have to take the stand. There is, moreover, some expectation that participants will take the time necessary, having learned details of the Postal Service's direct case during the specified discovery period, to put together their direct cases for timely filing. The procedural schedule and the Commission's consistent application of Rule 25(a) do not allow any two month lag. Contrary to UPS's implicit assumption and ardent desire, a rate case does not allow sufficient time for a complete top-to-bottom examination of every layer of any longstanding institutional data system upon which the ratemaking process has long relied. The business records exception and recent definition of library references documenting long term data systems as Category 1 reflect the inherent reliability of these systems. UPS' posited reason for questioning the

reliability of the RPW system's data is a "why" question that won't be answered by re-running the numbers and as such provides no basis to support turning over the data it seeks.

Statement of Burden Associated with Limited Affirmative Response

The Postal Service's most critical grounds for objection to various UPS interrogatories that seek to mine data regarding the roll-up of postage statement data into the BRPW input records have been burden and commercial sensitivity.<sup>10</sup> The Postal Service has neither been asked for such data in previous ratemaking proceedings nor been required to provide it; indeed, because the BRPW system relies upon a census of all mail entered in more than 2000 offices, and because it lies at the heart of the most basic transactions involving its customers' entry of mail and payment for it, BRPW provides exceptionally high quality data that are based directly upon the most sensitive records in the possession of the Postal Service. Even more than the Postal Service does not want to reveal facility specific information or that of its customers, the customers themselves are acutely sensitive about their mailing activities.

The Postal Service does not agree that UPS' examination of underlying data can answer the question it apparently seeks to answer – why Parcel Post estimates are now based upon BRPW when previously they were based upon DRPW<sup>11</sup> – but it also

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<sup>10/</sup> See Partial Objections of United States Postal Service To Interrogatories of United Parcel Service, UPS/USPS-T5-6(a), -7(b), -9(a), -12 and -16 (February 22, 2000); Objection of United States Postal Service to Interrogatory UPS/USPS-T5-30 (March 27, 2000); Objection of United States Postal Service to Interrogatories Of United Parcel Service, UPS/USPS-T5-40(c), 58(b-c), 82 and 87 (*Filed Under Protective Conditions*, April 3, 2000); United States Postal Service Objection to Interrogatory of United Parcel Service UPS/USPS—6 (April 17, 2000).

<sup>11/</sup> UPS stated this specific purpose in its original objection to admission into evidence of the RPW witnesses' testimony (at 4-5): "Review of the PERMIT System data and  
(continued...)"

recognizes that burden and commercial sensitivity objections do not in and of themselves make such inquiries irrelevant. The Postal Service submits that after complying with the Commission's rules regarding the availability of the input and output data sets (in LR-I-194), there is no necessity for peeling back the many layers of an inherently sensitive Category 1 data system. UPS could inquire directly into the reasoning behind the change from DRPW to BRPW instead of claiming that the "only" way to investigate this change is by examining the math found in the roll-up of PERMIT System data to CBCIS to BRPW input files to BRPW itself.

In recognition that the Commission nonetheless may require a better understanding of exactly how any underlying material could be made available, the Postal Service has undertaken to find a means that lessens the burden while permitting examination of the specific Parcel Post data UPS purports to need as a means of answering its (unrelated) "why" question – all within the confines of a ratemaking proceeding but without displacing resources dedicated to operational necessities.

An understanding of what could be provided must begin from an awareness of how the data collection system works. Postage statement information is recorded in the PERMIT System when mail is accepted; since it accounts for customer payments, information collected includes how much mail, in which category, paying what postage fees and rates, by what mailer who has which bulk mail entry permit, at what facility. Each PERMIT System record consists of a header entry identifying a mailer that is associated with one or more records reflecting an entry of mail in a single mail category by that mailer; payments into trust accounts also generate records. This information is

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<sup>11/</sup> (...continued)

programs along with postage statement information is the **only** suitable way to replicate and verify the accuracy of the new parcel post volume and revenue estimates. Without this data, the accuracy and reliability of the BRPW estimates cannot be confirmed." [Emphasis added.]



stored in a VAX computer located in one of the 85 district offices. A San Mateo mainframe computer polls each of the district VAX computers once each AP. In San Mateo, the PERMIT data are stripped of mailer, facility and employee identifiers, and records are then aggregated by Finance Number and product code to form the CBCIS RPW extract file. This becomes a raw input to the BRPW system.

The detailed PERMIT System information collected by the San Mateo mainframe is not retained on that system, although some of its extracts that serve as input to other functions, such as BRPW, are retained. Accordingly, replication of what UPS apparently seeks would require a customized polling process of each VAX computer for each finance number. A knowledgeable postal official estimates this would require twelve weeks of contractor time, measured from the time work began. Because of the significant operational disturbance (opportunity cost) this would cause, in addition to the specific burden and commercial sensitivity of the data, the Postal Service has consistently objected to interrogatories that seek this outcome.

UPS' primary focus appears to be verifying that postage statement data – revenue, pieces and weight data – are rolled up correctly into BRPW input records.<sup>12</sup> The Postal Service has accordingly investigated whether other means of achieving this goal can be found.

One of the files created by the San Mateo mainframe each AP is provided to a Postal Service contractor who also assists in some respects with the ratemaking process. That contractor reports that it can provide a file which includes the data elements necessary to start from the electronic equivalents of postage statement data

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<sup>12/</sup> A more recent synopsis of this interest is found in Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatory UPS/USPS-6 or, in the Alternative, To Extend Discovery Deadline on BRPW Parcel Post Estimates (April 28, 2000) at 2, ¶1.

and roll that data up to the point of replicating raw Parcel Post BRPW input files; it estimates this process would take approximately fifteen working days.<sup>13</sup> Moreover, it could be accomplished without displacing Postal Service operational resources from the business purposes they normally serve.

It should be understood that any file provided by this means would seek to protect sensitive information. Thus finance numbers would be redacted,<sup>14</sup> as would any other mailer, clerk, supervisor, or facility information.

The Postal Service hesitates to initiate this effort, however, since UPS also asks for all supporting data and information; moreover, providing such information would be unlikely to stop UPS from later asking for the inputs and outputs to the file created by the contractor. UPS' unmitigatedly broad request, for example in UPS/USPS-6, is for varieties of "all programs, documents, analyses and any other information used". The scope of such requests cannot reasonably be accommodated in the available time, and would still likely require thousands of hours of work. However, if the Presiding Officer compels responses to any of UPS/USPS-35, UPS/USPS-6, UPS/USPS-12A-14, UPS/USPS-T5-58(b-c), UPS/USPS-T5-87, or directs such action as a means of resolving UPS' Motion to Strike testimony, or its Objection to admission of the testimony of witnesses Pafford and Hunter, the Postal Service will undertake this work.

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<sup>13/</sup> Of course, any such responsive information would need to be provided only under the strictest of protective conditions. The BRPW records, even aggregated as they are across APs and finance number, can still reveal customer and facility specific information; even heavily redacted postage statements would be vastly more vulnerable to extraction of such information. With the rarest of limited exceptions, this is exactly why postage statement information has not previously and should not now be required in ratemaking proceedings.

<sup>14/</sup> Finance numbers could be masked using the same technique employed by witness Hunter in USPS-LR-I-194.

Specific Parts of UPS/USPS-6, 12A-15 and UPS/USPS-T5-35

**UPS/USPS-6:** This interrogatory asks for "all programs, documents, analyses, and any other information" used to aggregate postage statement information, and to correct it before or after aggregation, including SAS logs.<sup>15</sup> This request effectively asks the Postal Service to start over in documenting how it accepts mail and tracks payments for postage from the ground level of the loading dock to the CRA. UPS has directed hundreds of interrogatories to the BRPW witness and more generally to other witnesses that cover substantially the same ground. The "iterative correction process" described by witness Hunter during the technical conference is synonymous with his job description, which requires that data quality and changes over time be monitored constantly, thereby maintaining the quality and accuracy of BRPW results. He monitors his data closely because it is used widely by postal management to make the Postal Service run efficiently. That is not the same as changing the data, which he has explained must occur at the PERMIT System level. However, his information is still just a mathematical roll-up of postage statement data, as UPS has repeatedly been informed. As such, to the extent this interrogatory does not misconstrue his job function, it asks for the details of what he does all the time and thus is unduly vague and overbroad.

**UPS/USPS-12A :** *Part (a) of this interrogatory inquires whether UPS' inference from USPS-LR-I-279 that PERMIT System data are available on the San Mateo mainframe is correct; as discussed above, the inference is incorrect. San Mateo collects and processes PERMIT System data, but only stores information in its*

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<sup>15/</sup> The Postal Service objected to providing the SAS logs requested in UPS/USPS(d) when they were previously requested by UPS/USPS-T5-30 on March 27, 2000. No motion to compel was then forthcoming. UPS makes no attempt to justify or explain why it should be entitled to a second bite at this apple.

aggregated form (CBCIS data). Part (b) then requests the PERMIT System data underlying the BY1998 BRPW results. This is not readily available and would have to be reconstructed, as discussed above. The least burdensome means of looking at the arithmetic of the roll-up would be via an outside contractor, and it retains information that is similar, but not identical, to postage statement level. The postage statement level data are collected on the San Mateo mainframe, but not retained there. Part (c) appears to ask whether PERMIT System data are aggregated to BRPW results, which the Postal Service has confirmed many times in many ways, starting with USPS-T-3 at 3.

**UPS/USPS-13:** This interrogatory is very similar to UPS/USPS-12 in that it attempts to make inferences from USPS-LR-I-279 to the existence of raw PERMIT System data in San Mateo. As explained above, the data are uploaded but not retained.

**UPS/USPS-14:** This interrogatory points to USPS-LR-I-279 and requests a variety of source information, including PERMIT System data for PQ2 FY1997, the sample selection program, postage statements that were reviewed, documents identifying the verification procedures applied in reviewing postage statements, and postage statements viewed in 50 selected transactions. LR-I-279 was provided in response to UPS/USPS-T5-43, which sought data validation studies that inquired into the alignment of data fields and source documents. The study, which was performed by Ernst and Young, LLP, gave very high marks to the accuracy of PERMIT System and BRPW; it concluded, "Our procedures did not identify any significant variances in the accumulation of postage statement data on the PERMIT systems" (Executive Summary at 1).

UPS' inquiry here typifies its apparently unlimited ability to pose questions seeking burdensome production of voluminous and inherently sensitive data without

bothering to consider whether the information will truly inform any issue in this proceeding. Re-creating the PERMIT System extracts for PQ2 FY 1997 would require the same level of effort described above regarding FY 1998. Given the facts that LR-I-279 found no substantial problems and that the information predates the base year in this case, this inquiry is clearly intended only to burden the Postal Service with repetitive and unnecessary requests that will not lead to the discovery of admissible evidence. In any event, to the extent any other supporting materials yet exist they are in the possession of Ernst and Young and unavailable.

**UPS/USPS-15:** This interrogatory asks about the study in LR-I-279 rather than its specific inputs. Part (a) asks who did the study; part (b) asks why 50 sites local to Washington, DC were selected; part (c) asks whether Parcel Post was sampled at the same rate as other classes and subclasses; part (d) asks instances of inappropriate VIP code usage were found; and part (e) seeks confirmation of a quoted reason for why Postal Service management initiated the study. Aside from being late, these parts are in and of themselves not unduly burdensome; nor do they request sensitive data.

The identity of the study author is provided above. The use of 50 local sites was an economic decision since the authors were located in the DC area. The Postal Service does not know the response to (c), while parts (d) and (e) would be confirmed if answers were compelled.

**UPS/USPS-35:** This interrogatory inquires whether electronic postage statement data are available in one location, and if not how many facilities would house the complete universe of electronic Parcel Post postage statements. The Postal Service objects to this interrogatory on grounds of untimeliness, burden, materiality, commercial sensitivity, redundancy, overbreadth and relevance. As the discussion above elucidates, no single repository of electronic postage statements exists. Data are provided to an outside contractor, but they are not in the identical form of postage

statements. UPS has inquired extensively into the BRPW system, and knows how many offices provided data for BY 1998. Tr. 2/810-11. However, interrogatory 35 does not even limit itself to BRPW data. The process of polling the thousands of postal facilities that accept parcel post to determine which have available any form of electronic postage statement information would be unwarranted in the face of this clear fishing expedition. To the extent there is any reasonable means of furthering UPS' inquiries, they are encompassed by the interrogatories and motions addressed above.

### **CONCLUSION**

UPS has quite adequately expressed its interest in peeling back the layers of information between BRPW results and postage statements. The Postal Service has fully complied with the Rules of Practice, and even put significant resources into assisting UPS in replicating the BRPW results.<sup>16</sup> The information sought by UPS, a direct competitor to the Postal Service, has only rarely been limited to its identified interests. The Postal Service has long believed that postage statement data are acutely sensitive to its customers and to its own commercial interest, and the Commission has recognized and accommodated this interest nearly to perfection throughout the history of ratemaking proceedings.

Should the Presiding Officer, or Commission, determine that further inquiries into

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<sup>16/</sup> Exhibit B to Compel 6 illustrates some of the informal assistance provided by the Postal Service as UPS has worked to replicate the vast complexity of BRPW alone – an effort that would be dwarfed by attempting to replicate the entire system top to bottom. This illustrates how ultimately futile any effort to reconstruct the entirety of the BRPW Category 1 data system back to postage statements would be in the context of a rate case. While Exhibit B contains a number of factual errors, fails to reflect simple mistakes made by its own analysts, and mis-portrays the sequence of events in several respects, it does show that the Postal Service has diverted substantial resources from dealing with the formal rate case and other business requirements to assist UPS in replicating the BRPW results.

postage statement data are nonetheless required, the Postal Service requests that it be done through a disinterested third party or an employee of the Commission itself. In this way, the sensitive information would be protected completely, the substantial irrelevance of the requested information could be established to the Commission's own satisfaction, yet the mathematic exercises UPS complains of needing could nonetheless be satisfied.

WHEREFORE, the Postal Service objects to UPS/USPS-12A-15, 35, responds to UPS' motions to compel responses to UPS/USPS-6 and 12A-15, and opposes any extension of the time for discovery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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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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Kenneth N. Hollies

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