

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 THE MCGRAW-HILL
COMPANIES, INC. INTERROGATORIES TO WITNESS KINGSLEY
(MH/USPS-T10-23(b) and 26)
(May 15, 2000)

The United States Postal Service hereby objects to the McGraw-Hill Companies, Inc. interrogatories MH/USPS-T10-23(b) and 26 directed to witness Kingsley and filed on May 5, 2000. The interrogatories are not proper follow up and thus clearly untimely.

MH/USPS-T10-23 provides:

With reference to your response to MH/USPS-T10-12(f):

(a) Please describe fully each of the "seven other indicators" designed to "focus the field to improve productivity," state when each of those indicators was first utilized for that purpose, and provide any and all reports tracking such indicators in FY 1999 and/or FY 2000.

(b) Please provide a copy of all "instructions to the field re-stating national policies concerning FSM utilization, maximizing automation processing, and the proper staffing for all FSM operations" (USPS-ST-42, p. 20), issued in FY 1999 and FY 2000.

Subpart (b) clearly is not proper follow-up to witness Kingsley's response to MH/USPS-T10-12(f). The request is based directly on the quoted statement in witness O'Tormey's testimony and thus should have been directed to him by the applicable discovery cut-off date of April 26, 2000.

MH/USPS-T10-26 states:

In response to MH/USPS-T10-13(c), and in response to MH/USPS-T10-16, you referred to your response to ANM/USPS-T10-33, which consists of a chart showing

the percentages over time of flats that were handled manually, but excluding incoming secondary volumes, which were handled manually to a significantly greater extent.

(a) Please produce a version of that chart which reflects incoming secondary processing in both plants and delivery units.

(b) Please explain fully how the Postal Service keeps track of and counts over time the number of flat mail pieces that are handled manually, and the number of flat mail pieces that are handled in mechanized or automated operations.

These questions clearly were prompted by the chart attached to witness Kingsley's response to ANM/USPS-T10-33 and not the later-noted responses. The response to ANM/USPS-T10-33 was filed on March 24, 2000. Any follow up thus should have been filed more than a month ago.

Accordingly, the Postal Service should not be required to respond to these interrogatories.

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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