

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

RECEIVED  
Jul 5 4 27 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO CARLSON INTERROGATORIES DFC/USPS-28-32  
(July 5, 2000)

The United States Postal Service hereby objects to interrogatories DFC/USPS-28-32, filed on June 23, 2000. These interrogatories, which, in part, purport to follow-up the response of witness Robinson to DFC/USPS-T34-24, are the latest in long series of questions devoted to First-Class and Priority Mail service standards and the information provided about them via retail terminals. The Postal Service objects to these questions on the grounds that they are redundant of prior questions, cumulative, and, with respect to interrogatories 31 and 32, are not follow-up authorized by the Commission's rules. The Postal Service also objects on the grounds of relevance.

Interrogatories 28, and 29 pose completely hypothetical questions pertaining to the fictional installation of IBM retail terminals in San Francisco, and Washington, DC, and whether these fictional terminals would display certain service standard information pertaining to certain city pairs specified in the questions. The Postal Service objects that, even if answered, these questions would add nothing to the record of this case as they relate strictly to a set of events that does not exist and for which no foundation has been established. The questions, focused as they are on two hypothetical scenarios in two specific locations, have little bearing on the issues to be decided in this case and are therefore objectionable on the grounds of relevance.

Interrogatory 30 pertains to service standard information displayed on IBM retail terminals in Troy Michigan. This interrogatory does not depend upon the answer it purports to follow-up, could have been asked at any time in the prior months of avail-

able discovery, is not proper follow-up and is not authorized by the Commission's rules. Furthermore, the site-specific information it requests is not relevant to the nation-wide issues to be decided in this case.

Interrogatory 31 seeks confirmation of Priority Mail and First-Class Mail service standards between Troy, Michigan and a number of cities. The Postal Service objects to this request on grounds of relevance. Furthermore, this interrogatory does not even purport to be follow-up, and hence is not authorized.

Interrogatory 32 seeks the identification of Parcel Post zones applicable between six specific city pairs. Again, this interrogatory does not purport to be follow-up and is not authorized. The Postal Service also objects on the grounds of relevance.

Finally, the Postal Service objects on the grounds that Mr. Carlson has had a more than ample opportunity to pose questions about service standards, terminal displays, and zone identification throughout the appropriate discovery period. The Postal Service has already answered numerous interrogatories along these lines, and should not have to continue doing so on the eve of hearings on intervenor direct cases. Mr. Carlson's questions are in many cases cumulative of information already provided, and are *objectionable on that additional ground.*

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2993; Fax -5402  
July 5, 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.

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2993; Fax -5402  
July 5, 2000