

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. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-151, 152 AND 155)
(November 6, 2001)

The United States Postal Service hereby objects to Office of the Consumer Advocate interrogatories OCA/USPS-151, 152, and 155, filed on October 25, 2001. The interrogatories variously are irrelevant, overbroad, and burdensome to answer.

In interrogatory 151, the OCA requests copies of "every document relating to mail processing operations that is available to the Postal Service...." A similar request is made in 152, where the OCA ask for copies of "every instructional or procedural Postal Service document relating to mail processing that has been offered to, provided to, or requested by witness Kingsley since 1996." Finally in interrogatory 155, the OCA requests copies of "every document relating to mail processing data collection that is available to the Postal Service...."

It is abundantly clear that these questions are yet another foray by the OCA to gather information that has little, if any, probative value. Furthermore, the breath of the data requested places an undue burden upon the limited resources of the Postal Service. Additionally, the OCA attempts to extend the scope of discoverable

information by requesting documents supplied to witness Kingsley during a period when she was not an Operations manager (witness Kingsley did not become a manager until January 1998).

The Postal Service is amenable to supplying the OCA with information that is reasonable in nature. However, the Postal Service does object to supplying information that is voluminous, burdensome to compile, and, quite frankly, irrelevant to the issues presented in this proceeding. For the foregoing reasons, the Postal Service should not be required to respond to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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November 6, 2001

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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