

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

RECEIVED

JUL 24 4 2 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO OCA/USPS-3(B)
(July 24, 1997)

The United States Postal Service hereby objects to interrogatory OCA/USPS-3(b), filed on July 16, 1997, and amended on July 22.^{1/} The interrogatory as amended seeks answers to three interrogatories which were filed in Docket No. MC97-2. No response to these interrogatories had been filed in that docket because the case was withdrawn before objections or answers would have been due.

The three interrogatories are as follows:

OCA/USPS-T1-27. Please supply the names of each and every office responsible for selling and marketing Postal Service products and service, including, but not limited to, offices responsible for sales and marketing plans. For each such office, name the person who heads the office and provide his or her job description.

OCA/USPS-T1-28. Please supply the names of each and every office responsible for economic analysis, including, but not limited to, offices responsible for forecasting revenues, costs, volumes, and demand for postal services and postal products. For each such

^{1/} Amendment to Office of the Consumer Advocate Interrogatories to United States Postal Service (OCA/USPS-1-7). The amendment resulted when counsel for the Postal Service contacted counsel for the OCA in an attempt to avoid the necessity of an objection. As a result of those discussions, the OCA withdrew its questions that had already been answered in the parcel case or which were follow-ups to an answer provided in that case. Postal Service counsel informed OCA counsel that the Postal Service would object to the three remaining interrogatories on the grounds of relevance, but no further accommodation could be reached.

office, name the person who heads the office and provide his or her job description.

OCA/USPS-T1-31. Please supply a current organizational chart for the headquarters offices of the Postal Service. If a separate chart for headquarters does not exist, please supply one for the entire Postal Service.

The Postal Service objects to these interrogatories on the grounds of relevance. Under rules 25 and 26, interrogatories must appear to be "reasonably calculated to lead to the discovery of admissible evidence...." These interrogatories fail to meet this standard. How the Postal Service is organized and the names of particular Postal Service offices and employees or their job descriptions will not produce admissible evidence relevant to the substance fo the matters at issue before the Commission in this docket.

It appears that the OCA may believe that there is some procedural need for the information it is seeking. There is not; and, in any event, such perceived need would not establish relevance. The Postal Service has filed the testimonies of 40 different witnesses in support of the changes sought in its Request. These witnesses are available to respond to interrogatories regarding their testimonies. If an interrogatory raises issues outside the scope of a particular witness's testimony, it will be redirected to the appropriate witness or to the Postal Service.

The OCA's interrogatories evince an interest in forecasting and in sales. To the extent the OCA wants to conduct discovery on an area (such as the forecasting of costs, volumes, etc.) concerning which there are witnesses who have presented testimony, it need only direct its interrogatories to those witnesses. If the OCA believes that an aspect of postal operations not covered by a particular witness (such as sales) has some relevance to a witness's testimony or to some other aspect of the

Request, it may direct its interrogatories to that witness or to the Postal Service generally. It need not have names, charts, or job descriptions to do so.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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.



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
July 24, 1997