

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, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO UPS/USPS-3  
(July 28, 1997)

The United States Postal Service hereby objects to interrogatory UPS/USPS-3, filed on July 18, 1997. This interrogatory, which is virtually identical to interrogatories filed by UPS in Dockets No. MC96-3 and MC97-2,<sup>1</sup> asks the Postal Service to refer to a table entitled "Cost Segment 3.1 Clerks and Mailhandlers (F9252=2,3, or 4) IOCS F9250 (Tally Dollars)," and to

- (a) Please confirm that costs associated with CAG A offices significantly decreased from 1993 to 1995. If confirmed, please explain what caused this decrease. If not confirmed, please explain.
- (b) Please confirm that costs associated with CAG B offices significantly increased from 1993 to 1995. If confirmed, please explain what caused this increase. If not confirmed, please explain.
- (c) Please explain the changes from 1993 to 1995 in the costs associated with CAGs C-J.

The Postal Service objected to this interrogatory in Docket No. MC96-3 on the grounds of relevance and burden,<sup>2</sup> and objects similarly here. As the Postal Service indicated in its objection to this question in Docket No. MC96-3, FY 1993, one of the years about which the interrogatory seeks clarification, was the base year in Docket No.

<sup>1</sup> Docket No. MC96-3, Followup Interrogatories of United Parcel Service to United States Postal Service (UPS/USPS-1 through 3) (September 3, 1996), UPS/USPS-3; Docket No. MC97-2, Sixteenth Set of Interrogatories and Requests for Production of Documents from United Parcel Service to the United States Postal Service (April 8, 1997), UPS/USPS-7.

<sup>2</sup> Docket No. MC97-2 was withdrawn before the date that an objection or response to UPS/USPS-3 would have been due. See Commission Order No. 1175, Notice of Withdrawal of Request by United States Postal Service and Order Granting Motion to Close Docket (May 9, 1997), at 5. UPS did not seek to compel a response to the interrogatory in Docket No. MC96-3.

years about which the interrogatory seeks clarification, was the base year in Docket No. R94-1, the last general rate case. The record in that proceeding shows no reluctance on the part of the proceeding's participants and the Commission to pose questions regarding the IOCS and other Postal Service data systems; if UPS desired similar information, it should have asked for it at that time. Correspondingly, FY 1995, the other year specified by the interrogatory, has been the base year in a number of Commission proceedings, including Dockets No. MC96-3 and MC97-2; the base year in the current proceeding is FY 1996. The fact that UPS chose not to pursue its discovery requests in the face of objection in Docket No. MC96-3 does not enhance the relevance of FY 1995 to the Postal Service's proposals in *this* docket.

Moreover, despite UPS's citation of sources for the numbers in its table,<sup>3</sup> the burden involved in responding to these questions would be considerable and undue. The citations provided are to Docket No. MC96-3, LR-SSR-22, In-Office Cost System Machine-readable Copy of Output Data; and Docket No. R94-1, LR-G-122, IOCS Tapes Including Fields for Container Contents, Filed in Response to UPS/USPS-T4-64.

In order for the Postal Service to verify the figures presented in the UPS's table, it would still need to run both sets of tapes cited. Having done that, UPS then asks the Postal Service to account for every change in the costs associated with every CAG between FY 1993 and FY 1995. As the Postal Service has earlier objected regarding this question, potential reasons for changes in costs from year to year could be infinite in number. The burden involved in responding to this discovery request, coupled with

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<sup>3</sup> In Docket No. MC96-3, no such citations were provided.

the inapplicability of the years cited to the proposals presented in this docket, render the discovery request unacceptable.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**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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