

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 THE UNITED STATES POSTAL SERVICE
TO NDMS INTERROGATORY TO WITNESS FRONK
(August 8, 1997)**

The United States Postal Service hereby files this objection to the following interrogatory directed to witness Fronk by Nashua, District, Mystic and Seattle on August 1, 1997: NDMS/USPS-T32-16.

This interrogatory requests that witness Fronk explain whether USPS Library Reference H-112 was prepared by postal employees or consultants and to name all *employees and/or consultants who had a hand in its preparation*. It also asks that he provide a copy of any contract specifications, if the Library Reference was prepared by consultants.

The Postal Service objects to this interrogatory because it asks for information which is irrelevant to this proceeding. It also is not reasonably calculated to lead to the production of admissible evidence. Whether the Library Reference is the work product of postal employees and/or postal consultants has no bearing upon the issues before the Commission. Nor does any list of the names of those individual employees and/or consultants. Moreover, assuming USPS-LR-H-112 were the product of work performed by a consultant, the specifications of any contract between the Postal Service and that consultant are irrelevant to the issues in this proceeding. NDMS is free to continue to direct interrogatories to the Postal Service about the substance of the Library Reference and the Postal Service will respond to them.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

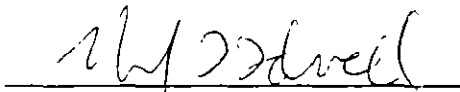


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August 8, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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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