

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO
UNITED PARCEL SERVICE INTERROGATORY UPS/USPS-T14-4(a)
(August 11, 1997)

The United States Postal Service hereby enters a partial objection to United Parcel Service interrogatory UPS/USPS-T14-4(a) directed to witness Bradley. The information requested is irrelevant, may be burdensome to produce and may contain commercially sensitive and proprietary matter.

UPS/USPS-T14-4(a) states, "Please provide a descriptive list of all data available through MODS and PIRS." The Postal Service will file a response which gives a basic description of the broad categories of information available through MODS and PIRS, but it will not provide a descriptive list of each and every kind of data contained in those systems. The information provided should be more than sufficient for any legitimate use UPS wishes to make of this type of material in this docket. In the event that UPS nonetheless wishes to pursue additional detailed information, however, the Postal Service desires to preserve its right to object.

Witness Bradley used relatively limited volume and hour data from MODS and PIRS to derive variabilities for mail processing. He has provided full documentation of the analysis he performed in his testimony, workpapers, and associated library references. The data provided are sufficient for intervenors to verify and replicate witness Bradley's results, as well as to perform their own analyses using various

subsets of the data. Other data that may be available from MODS and PIRS are simply irrelevant to the issues raised by witness Bradley's analysis.


In addition, because there are numerous types of data available from MODS and PIRS, compiling the list requested by UPS could be burdensome. Also, various of the data may be considered commercially sensitive and proprietary by the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

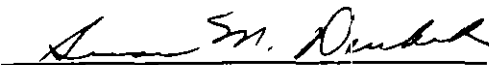
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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August 11, 1997