

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE ALLIANCE OF NONPROFIT MAILERS
TO WITNESS TAYMAN (ANM/USPS—T9-1(g)(ii))
(August 14, 1997)

The United States Postal Service hereby objects in part to interrogatory ANM/USPS—T9-1(g)(ii), filed on August 4, 1997, by the Alliance of Nonprofit Mailers.

Interrogatory 1(g) reads as follows:

For Fiscal Year 1996, please show (i) the budgeted income ("the plan") at the outset of the Fiscal Year, by Accounting Period, and (ii) the actual income for each Accounting Period and explain major deviations from plan versus actual.

The Postal Service objects to the second question in part (ii). The information requested in the other parts of the interrogatory (part (i) and the first question in part (ii)) has already been made public and the interrogatory will be answered to that effect.

The explanation sought in the second question of part (ii) is irrelevant to the issues before the Commission in this case. The Postal Service has provided actual, audited results for FY 1996. These actual results are the basis for the test year projections in this case. Previous internal management plans are not part of this estimation process. Accordingly, the consistency of previous internal management plans for FY 1996 with actual results has no effect on and no relevance to the projections provided for the test year in this docket.

It should be noted that other parts of the interrogatory seek information regarding actual results to date and projections for the remainder of FY 1997. This information will be provided.

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

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