

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 INTERROGATORY OF NASHUA PHOTO INC. ET AL.
TO WITNESS CRUM (NDMS/USPS—T8-1(a)-(d), (f) & (g))
(August 18, 1997)

The United States Postal Service hereby objects to interrogatory NDMS/USPS—T28-1(a)-(d), (f) & (g), filed on August 8, 1997, by Nashua Photo, Inc., et al. Parts (a) through (d) ask whether and to what extent witness Crum prepared or participated in the preparation of Libraray Reference H-108, and whether he or any other witness in this docket is "sponsoring" library reference H-108. Part (g) asks whether the Postal Service designated a technical representative to oversee the study and whether witness Crum was that designee. Part (f) asks when the contractor submitted the "final report that has been submitted as LR-H-108."

These questions are not reasonably calculated to the lead to the discovery of admissible evidence. Witness Crum has answered and remains available to provide answers to questions concerning the library reference and his use of it. A library reference, by definition, needs no particular "sponsor." His role in the process, the particular terms of the contract and their execution with regard to the designation of a technical representative, and the date of provision of a "final report" to the Postal Service all are irrelevant to the actual issues in this proceeding. By contrast, witness Crum will be responding to part (e), which asks only when the study commenced, by providing the dates during which the analysis was conducted. Unlike the information

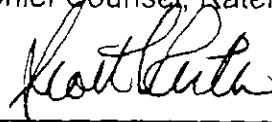
sought in the other questions, the time period could arguably be relevant to evaluating the analysis set forth in the library reference.

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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