

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

RECEIVED
SEP 2 4 46 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY ABP/USPS-T4-3 TO WITNESS MODEN
(September 2, 1997)

The United States Postal Service hereby objects to interrogatory ABP/USPS-T4-3, filed on August 20, 1997. This interrogatory seeks certain "Operations Models" to the extent the latter are not provided elsewhere in the rate case.

The Postal Service objects to providing these items because they are beyond the scope of the witness's testimony. Indeed, the interrogatory itself hints at its objectionability by citing only one place in the witness's testimony. The citation is to page 1, which contains the witness's autobiographical sketch, specifically a listing of the responsibilities of the office he heads. Indeed, ABP could have included no other citations to the witness's testimony regarding these items because the witness makes no further reference to them and does not rely upon them to support his testimony. No other witness in this case refers to them or relies upon them.

The scope of the witness's testimony is defined by the testimony itself, not by the witness's description of his other responsibilities. The items sought in the interrogatories do not underlie or support the matters discussed in the witness's testimony. *The mere fact that he mentioned them in his autobiographical sketch does not make them relevant to his testimony, which discusses a limited number of matters within his area of responsibility, and does so specifically to support other witnesses' testimonies in this case.* If the items requested formed part of the foundation of the witness's testimony, the Postal Service would not object to providing

them merely because the requesting party cited his autobiographical sketch and will be responding to other such interrogatories. But in this case there is no such connection.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
September 2, 1997