

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
ASSOCIATION FOR POSTAL COMMERCE
INTERROGATORY POSTCOM/USPS-T39-22
(December 17, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory POSTCOM/USPS-T39-22, filed by the Association for Postal Commerce on December 5, 2001, on the grounds of relevance, overbroad, and materiality.

In interrogatory 22, Postcom requests certain information related to AFSM 100 mail characteristics' test conducted by an outside consulting firm. Postcom seeks "all documents...whether final or not," "all data," and "all preliminary results" related to the mail characteristics' test. The scope of this request is far beyond that which reasonably can be considered relevant to any issue in this proceeding. Clearly, not every document produced by the outside consulting firm will be meaningful or relevant. It is quite possible that some, if not most, of the preliminary data will not be used in final test results. The requested information simply lacks probative value and, therefore, is immaterial.

The Postal Service made clear in its response to POSTCOM/USPS-T39-12(a) that the test results were not currently available. The Postal Service felt

that the data, in the form in which it was presented, did not conform to the “scope of work”. As a result, the Postal Service returned the preliminary data and asked that it be reformatted to meet the Service’s needs. Consequently, when the final test results are received, the Postal Service will make that information available to Postcom and any other interested party. However, to be required to divulge raw data which may or may not have any bearing on postal operations is not only objectionable, but also ridiculous.

Moreover, the Postal Service fails to see how the release of such irrelevant information will aid Postcom and, ultimately, the fact finder in their determination of postal operations in general, and the use of the AFSM 100 more specifically. The request simply lacks relevance and materiality to any issues in this docket.

Finally, the Postal Service’s technical representative for this study has been assigned to evaluate the effectiveness of equipment used to irradiate mail. The duration of that assignment is currently unknown. However, every effort will be made to timely release the test results once final data are received from our consultant.

Consequently, for all of the above stated reasons, the Postal Service objects to the release of information requested in POSTCOM/USPS-T39-22.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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December 17, 2001

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.

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