

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-5001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO OCA/USPS-T3-3  
(September 8, 1997)

The United States Postal Service hereby objects to interrogatory OCA/USPS-T3-3, filed on August 28, 1997. This interrogatory is part of a set of discovery requests that concerns the discussion of recoding of certain mail in Library Reference H-89. It asks witness Harahush to describe the extent to which "random recoding of recorded subclass [sic] been utilized in other Postal Service data collection systems over the last 10 years," and would have him "list each occurrence and provide the justification for the use of random recoding." The Postal Service objects to this interrogatory, to the extent that it seeks information on years prior to the base year in this proceeding, on the basis of relevance.

It should be noted that the Postal Service will be filing a partial response to this interrogatory. The response will relate that the process of "random recoding" has not been used by the Postal Service in the past; the circumstance related in Library Reference H-89 is, to the knowledge of the Postal Service, the only time in which random recoding of data has taken place. However, the Postal Service wishes to emphasize that, by providing this response, it does not waive its objection to the question as posed by the OCA. The OCA is aware that this proceeding is based upon the data used for the base year, FY 1996; its discovery request would have the Postal Service make a search for and an accounting of its recoding of data for the nine years preceding the base year. Such information, while it may appear interesting to the OCA,

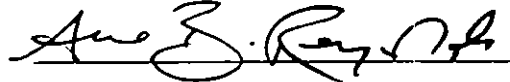
is patently irrelevant to the proposals set forth in this proceeding. Requiring the Postal Service to scrutinize its records and report on items of interest to participants, for some evidently arbitrarily-selected period unrelated to matters before the Commission, would be a clear abuse of the discovery process.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

A handwritten signature in cursive script, appearing to read "Anne B. Reynolds", written over a horizontal line.

Anne B. Reynolds

#### 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.

A handwritten signature in cursive script, appearing to read "Anne B. Reynolds", written over a horizontal line.

Anne B. Reynolds

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September 8, 1997