

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OCA/USPS-17a AND 20c  
(September 11, 1997)**

The United States Postal Service hereby files these objections to the following interrogatories filed by the Office of the Consumer Advocate on September 2, 1997: OCA/USPS-17a and 20c.

**OCA/USPS-17a**

The interrogatory requests a description of "all reports, studies, and surveys, a description of their purpose, and the completion dates (or expected completion dates) of such reports, studies and surveys.

The Postal Service objects to this question as vague and overly broad. The interrogatory is unlimited in its scope and not reasonably calculated to lead to admissible evidence relevant to issues in this proceeding. Numerous departments at Headquarters alone have produced or are engaged in the production of "reports, studies, and surveys" on numerous topics, many of which have nothing to do with issues being litigated in this proceeding. Moreover, to the extent that the Postal Service presently is considering the production of "reports, studies, and surveys" in connection with issues which may arise later in this proceeding, the Postal Service believes that it is not required to disclose any such plans, for the reasons discussed below.

**OCA/USPS-20c**

This interrogatory requests that the Postal Service "list all pending proposals for

reports, studies, and surveys (whether or not in final form) relating to the CEM proposal, or to any proposal substantially similar to CEM.

In substance, the OCA is requesting that the Postal Service reveal the nature and form of the litigation strategy it might pursue if it should be faced with an intervenor proposal for Courtesy Envelope Mail (as proposed by the OCA in Docket No. MC95-1) or something substantially similar in the instant proceeding. The Postal Service considers its litigation strategy in this proceeding to be protected from disclosure under the attorney-client privilege. Accordingly, the Postal Service believes that it is not obliged to reveal what it might be doing in contemplation of the possibility that certain issues might later arise in this proceeding.

No intervenor in this proceeding is required now to reveal the extent to which it is engaged in the production of reports, studies, surveys which might be filed in response to the rate and classification proposals presently at issue in this proceeding. That being so, it is mystifying why the OCA believes the Postal Service should now be required to divulge whether it is considering the production of reports, studies, and surveys in response to particular rate and classification proposals (or ones which might be substantially similar) which have yet to be presented in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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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Michael T. Tidwell

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September 11, 1997