

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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
NDMS MOTIONS TO COMPEL RESPONSES TO
INTERROGATORY NDMS/USPS-T33-10
TO WITNESS SHARKEY
(September 12, 1997)

On August 11, 1997, the United States Postal Service filed objections to interrogatory NDMS/USPS-T33-10b, filed on August 1, 1997. On August 25, 1997, NDMS moved to compel a response to interrogatory 10, and on August 29, 1997, supplemented this motion. In accordance with Presiding Officer's Ruling No. R97-1/13, which granted an extension of time in which to attempt to informally resolve this matter, the Postal Service now responds to the motion by announcing that an informal resolution has been reached with counsel for NDMS.

In order to reach a resolution regarding the Priority Mail service performance data sought in this interrogatory, undersigned counsel agreed to verify the status of such service performance information, and, following investigation, concluded that although some customer-specific, unrepresentative service performance data relating to delivery confirmation for Priority Mail exists, such data would not be representative of actual national service performance and would be confidential. Likewise, although some preliminary results stemming from a pilot test of a Priority Mail service performance measurement system exist, these results are so preliminary as to make them unreliable and unrepresentative. When informed of this information, counsel for NDMS indicated that, reserving the right to conduct further discovery on Priority Mail service perfor-

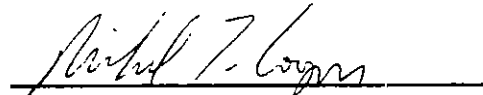
mance, he would consider this dispute regarding interrogatory 10 to be resolved if a Postal Service witness were to provide FY 1996 quarterly Priority Mail national service data from the ODIS system. The Postal Service has agreed to produce such a response early next week. Given this informal resolution, the Postal Service, with the concurrence of counsel for NDMS, moves that this discovery dispute be considered moot.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

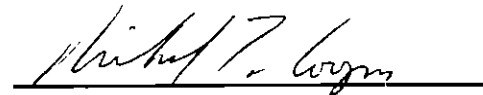


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September 12, 1997

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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