

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION FGFS/USPS-T13-41  
(September 15, 1997)

The United States Postal Service hereby objects to Florida Gift Fruit Shippers Association interrogatory FGFS/USPS-T13-41. The information requested is irrelevant and would be unduly burdensome to produce, to the extent any or all of it still exists.

FGFS/USPS-T13-41 states:

Your testimony refers to 12,846 contracts in force in 1986, and there were 14,781 in your analysis.

- a) Provide a breakdown by account type for the 1986 contracts
- b) Provide the number of contract [sic] in force each year between 1986 and 1996 with a breakdown by account type.

The requested information is completely irrelevant. Witness Bradley used contracts in force as of August 1995 in his analysis. *USPS-T-13, at 14*. Data from other years -- prior or subsequent -- were not used and thus can have no bearing on the analysis or the results thereof presented by witness Bradley. Witness Bradley mentioned the number of contracts in force in 1986 in his testimony in the context of a discussion concerning the sample of contracts used for his Docket No. R87-1 purchased transportation analysis as contrasted with his use in this docket of data from all of the FY 1995 contracts. That hardly makes FY 1986 data or data for other years

ripe for discovery.

The data for other years is also irrelevant because witness Bradley's testimony establishes that "the general structure of the highway transportation network is basically the same as in 1986." *Id. at 7-8*. Witness Bradley states that (1) highway contracts in his analysis are still classified by the same accounts as in 1986, (2) the number of contracts in force is roughly the same, (3) contracts within each account category are still used for basically the same purposes, (4) contracts within each account category still have basically the same operating characteristics as to schedules, truck size and annual miles traveled, (5) contracts still tend to be bid the same way, and (6) contracts still have the same term of four years. Moreover, witness Bradley re-estimated the Commission's econometric models from Docket No. R87-1 with his new FY 1995 data and there was not much change in the results. *Id. at 20-26*.

Further, some of the data probably no longer exist. The record retention policy for purchased highway transportation contracts is seven years. Thus, it is unlikely that contracts prior to FY 1990 have been kept. Some information for FY 1986 is still available -- the information filed with witness Bradley's testimony in Docket No. R87-1. Witness Bradley's Workpaper 1 (USPS-T-9) in that docket shows a breakout of the FY 1986 contracts by the account types of inter-SCF, intra-BMC, inter-BMC and account 53121 (intra-City, regular intra-SCF, and box delivery).

Whatever information exists for previous years would likely be unduly burdensome to produce. As far as the Postal Service is presently aware, one method of reconstructing this information would involve contacting each of the 12 DNO's,

having them search their files -- many of which likely will have been archived --, retrieve hundreds or thousands of contracts for those years for which they still exist, and classify them by account type. The Postal Service is unable to provide an estimate of how long this might take, other than to conclude, as is obvious, that the effort would be monumental. The Postal Service also is informed that for the years FY 1990 and forward, the numbers of contracts in force and certain account type information may be able to be extracted from account payment system data in St. Louis. Personnel there, however, estimate that approximately 240 person hours would be needed to develop that information. The burden associated with producing the information either through the DNOs or through St. Louis would be totally unjustified under any circumstances. It is particularly unwarranted here given the lack of relevance of the requested information.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
September 15, 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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
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