

# DOCKET SECTION

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 UNITED STATES POSTAL SERVICE TO DBP/USPS-8(CC) (September 25, 1997)

The United States Postal Service hereby objects to subpart (cc) of interrogatory DBP/USPS-8, received by the Postal Service on September 10, 1997.<sup>1/</sup> This subpart asks the Postal Service to "provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation services." The Postal Service objects on the grounds that the question is overbroad and because of the considerable burden entailed in providing a response.

The Postal Service's field structure relevant to Mr. Popkin's interrogatory consists of ten Area offices and twelve Distribution Network Offices. Mr. Popkin's request would have the Postal Service comb each of these offices, as well as Headquarters, for every instruction or memo touching on the Postal Service's judgment of when the use of air transportation is appropriate. Mr. Popkin specifies no time limit for which he seeks this information. This search, were the Postal Service even equipped to conduct it, could yield hundreds of documents. Each of these documents would need to be reviewed by the Postal Service Law Department and the appropriate technical

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<sup>1</sup> Presiding Officer's Ruling No. R97-1/21 allows the Postal Service until today, September 25, 1997, to file objections to specific interrogatories filed by Mr. Popkin. POR No. R97-1/21 (September 18, 1997).

and/or contracting personnel, redacted, if necessary, and reproduced.<sup>2/</sup> The effort would take weeks of time, at the peak of discovery and hearings activity.

Mr. Popkin has posed a profusion of discovery requests regarding the speed and levels of service for various Postal Service products, as well as the Postal Service's use of different types of transportation. He will undoubtedly receive a wealth of information responsive to his many specific requests. Whether the search requested in DBP/USPS-8(cc) will further his interests by providing still more material that may be of use as evidence in this proceeding is dubious, and certainly does not outweigh the substantial burden inherent in conducting such a investigation.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



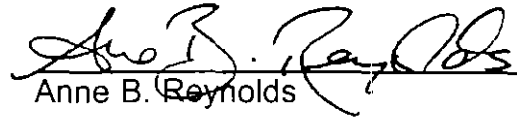
Anne B. Reynolds

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<sup>2</sup> If this search were to produce documents of a confidential nature, or which contained proprietary commercial information, the Postal Service reserves the right to make the appropriate objections once such documents may be located.

**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.

  
Anne B. Reynolds

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September 25, 1997