

## 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

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO DOUGLAS CARLSON INTERROGATORIES DFC/USPS-3 AND 4  
AND MOTION FOR LATE ACCEPTANCE  
(September 26, 1997)**

The United States Postal Service hereby objects to two interrogatories directed to it by Douglas Carlson in a document dated September 15, 1997. Undersigned counsel did not receive a copy of the document until after 5:00 p.m. yesterday, the date on which objections would have been due. Counsel moves for late acceptance of these objections today. Any prejudice to Mr. Carlson is mitigated by the fact that counsel has transmitted an electronic copy of this document to him last night, making him aware of its contents several days before he would have received a hard copy version mailed yesterday by First-Class Mail in accordance with the Commission's Rules.

**DFC/USPS-3**

This interrogatory requests that the Postal Service identify and list the five proposed rates and fees in this case that reflect the highest cost coverages. This interrogatory is not calculated to lead to the discovery of admissible evidence. The information necessary to prepare the list is contained in the exhibits which accompany the testimony of witness O'Hara (USPS-T-30). Mr. Carlson has those exhibits and is fully capable of preparing such a list, for whatever purpose he desires, without burdening the Postal Service with the chore.

**DFC/USPS-4**

This question asks the Postal Service to review every rate or fee approved by the Governors since postal reorganization and to identify those which reflected a cost coverage in excess of either 275 percent or 300 percent. The Postal Service objects to this interrogatory because it imposes an undue burden which is well out of proportion to any value such information could have to these proceedings. The merits of each Postal Service's cost coverage proposal in this proceeding will be judged on the basis of whether it complies with the policies of the Postal Reorganization Act, not whether it is the first, fifth, or umpteenth highest in postal ratemaking history.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

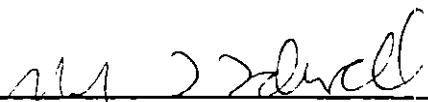
By its attorneys:

Daniel J. Faces, Jr.  
Chief Counsel, Rate making

  
\_\_\_\_\_  
Michael T. Tidwell

**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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Michael T. Tidwell

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