

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO UPS/USPS-28 AND 32 (September 29, 1997)

The United States Postal Service hereby objects to certain subparts of the following interrogatories filed by United Parcel Service on September 17, 1997: UPS/USPS-T2-28(b)(i), (iii) and (iv); -28(d); and -32(c). The Postal Service's grounds for objecting are burden, and, in the case of certain of the interrogatories, that they seek commercially sensitive data.

Interrogatory UPS/USPS-T2-28(b) refers witness Nieto to DMM Section E652, Exhibit 1.5, which is a table of twenty-nine BMC/ASF Parent Post Offices, and asks witness Nieto to indicate the mileage between these pairs of facilities under several different methods of calculating mileage. Subpart (b)(i) asks that she provide the miles traveled, as used in her testimony at page 17, line 2; subpart (b)(iii) requests the highway miles between the pairs of facilities; subpart (b)(iv) seeks the Great Circle Distances (in miles) between each pair of facilities.

The Postal Service objects to providing this information on the grounds of burden. The information sought by UPS may easily be determined by them, using commercially-available software. Moreover, the Postal Service has already provided the material relevant to subparts (b)(iii)-(iv), albeit in encrypted form. Witness Nieto estimates that it would take several days of her full attention to complete the analysis made by UPS; days that may be spent much more fruitfully in responding to proper discovery and preparing for hearings. Because the information may be computed by UPS, and because the Postal Service has already provided most of the information requested in encrypted form, UPS cannot seriously argue that the production, by the Postal Service,

of the material sought, will have any meaningful contribution to the record of this proceeding sufficient to outweigh this burden.

UPS/USPS-T2-28(d) also refers to Exhibit 1.5 in DMM E652, and asks that witness Nieto "provide the name, 3 or 5 digit NASS facility code, and 3 digit alpha type." The Postal Service objects to this interrogatory to the extent that disclosure of this information, coupled with the other material requested in this set of discovery requests, would further UPS's ability to obtain origin-destination specific information that the Postal Service has consistently regarded as commercially sensitive.

Finally, UPS/USPS-T2-32(c) asks for the following reports, in hard copy and in machine-readable form, for each Postal Quarter in 1996, for all transaction codes:

- LAT274P2 (Surface Master)
 - for all AMC/AMFs
 - for all BMCs
 - for all PLDs
- LAT277P1 (Intra-Area Transportation Report)
 - for all AMC/AMFs
 - for all BMCs
 - for all PLDs
- LAT420P1 (Transportation Master by Key with Dispatch Hooks) for all origin-destination pairs where either is an AMC/AMF
- LAT421P1 (Transportation Master by Key without Dispatch Hooks) for all origin-destination pairs where either is an AMC/AMF
- LAT488P1 (Airport Transportation Requirements) for all AMC/AMFs
- LAT500P1 (Surface Transportation Master List) for the area of administrative responsibility that includes Chicago, IL
 - If any of these reports (as identified in the NASS Report Users Guide) no longer exists, please identify and provide the information that the report would have provided.

The Postal Service objects to this interrogatory on the basis of burden, relevance, and commercial sensitivity. Attempting to provide this information would constitute an

immense burden; it is anticipated that several weeks of effort would be required to prepare the reports, have them reviewed by counsel and by technical persons familiar with the information in them, and redact the reports, if necessary. Moreover, the effort involved in producing the volumes of material requested would have, at most, only the most marginal contribution to the record of this proceeding. Such an effort is simply not warranted.

In the preparation of the filing its TRACS information for this proceeding, the Postal Service undertook significant efforts to ensure that it had provided the information necessary to replicate its results in an encrypted form that would allow the participants to utilize the material in the Postal Service's management information systems while protecting the proprietary information contained therein. The material, in the form that UPS now requests it, would permit UPS to determine the transportation capacity and routing information between each of the Postal Service's facilities; information that is clearly and obviously commercially sensitive. This information need not be produced in order for UPS to use TRACS, and the Postal Service should neither be required to undertake this effort nor to release any of the commercially proprietary information such an effort would turn up.

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorneys:

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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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