

# DOCKET SECTION

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

RECEIVED  
SEP 29 4 50 PM '97

POSTAL RATE AND FEE CHANGES, 1997

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

## OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY DMA/USPS-T4-97 (September 29, 1997)

The United States Postal Service hereby objects to interrogatory DMA/USPS-T4-97, directed to witness Moden on September 17, 1997. That interrogatory asks:

Does the Postal Service have or collect data that would allow it to determine clerk and mailhandler hours by AP by tour at MODS offices? If so, please provide it for FY96

The Postal Service objects to responding to this interrogatory on the ground of undue burden.

First, the Postal Service wishes to make clear that it objects to this interrogatory given its broadest reading. If it were not written so broadly, the response would simply be that the Postal Service does not have or collect clerk and mailhandler hours by AP by tour. Furthermore, if indeed the Postal Service had the requested information, it would not object to providing it.

The question is worded in a very broad fashion, however. It asks if the Postal Service has or collects "data that would allow it" to develop the requested reports. Certain, disparate raw data may exist which would theoretically allow the production of such reports. Therefore, the Postal Service objects. The production of such reports may be theoretically possible, but doing so would be extremely burdensome and time consuming. The burdensome effort that would be required to produce the

requested reports, however, is not justified, and would not be able to be done in a timely fashion with regard to the schedule in this docket.

Producing the requested reports would require a massive effort including collection of raw data of various types from individual offices, including employees' clockrings, and the hours of tours, which may vary from one facility to the next and which may change over time. Once the needed data were aggregated, verified, and analyzed, a large computer programming effort would be required to crosswalk those data with other data in other locations in order to produce the requested reports. Moreover, because the required raw data are not centralized, there is no assurance that every office would have retained the required data or that its level of accuracy is consistent across all offices.

Because of the massiveness of this undertaking, it is difficult to estimate the time required, but the best guess of those familiar with these systems is that the entire effort needed to produce the requested reports would take at least three to four months. We also are unable to estimate the workhours and costs involved, but they would also be likely to be significant, given the scope of the effort required.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



---

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999; Fax -5402  
September 29, 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.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written over a solid horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999; Fax -5402  
September 29, 1997