

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 MCGRAW-HILL COMPANIES' INTERROGATORY (MH/USPS-T5-1) (September 29, 1997)

The United States Postal Service hereby objects to McGraw-Hill Companies interrogatory MH/USPS-T5-1, filed on September 17, 1997. The information is not required by either the letter or the spirit of revised Rule 54(a)(1).

MH/USPS-T5-1 states:

(a) Please confirm that the volume variable costs calculated for Periodicals mail in this proceeding are higher than the attributable costs calculated for Periodicals mail (pursuant to section 54(a)(1) of the Commission's rules of practice) in this proceeding. See, e.g., Attachment A (attached hereto) to the Motion of the United States Postal Service for Reconsideration of Parts of Presiding Officer's Ruling No. R97-1/7 (August 15, 1997). To the extent that you are unable to confirm, please explain fully.

(b) Please explain fully (with appropriate cross-references to USPS-LR-H-196 and 215, and to any other relevant materials) each of the factors which cause the volume variable costs calculated for Periodicals Regular mail to be higher than the attributable costs calculated for Periodicals Regular mail.

Responding to this interrogatory clearly would require witness Alexandrovich or the Postal Service (if it were redirected) to discuss details of the Commission's cost model. The Postal Service, as it has stated repeatedly, has complied with both the letter and the spirit of revised Rule 54(a)(1). The reasons why the Postal Service

should not have to respond to discovery on the Commission's costing methodology have been spelled out in detail in previous pleadings in this docket and will not be repeated here. See *Objection of the United States Postal Service to Major Mailers Association Interrogatories MMA/USPS-T5-1 and 6(b), MMA/USPS-T25-1(B) and (C), MMA/USPS-T30-3(A) through (D), 4(A) through (D), 6, 7(A)(2) and 8(C)(1) through (3), AND MMA/USPS-T32-15(b), August 25, 1997; Opposition of United States Postal Service to Major Mailers Association's Motion to Compel Answers to Certain Interrogatories and the Office of the Consumer Advocate Reply in Support Thereof, September 15, 1997; and Opposition of the United States Postal Service to Major Mailers Association Motion Requesting Leave to File a Reply or, in the alternative, Motion for Leave to Respond to the Reply, September 24, 1997*. For all of the reasons stated in those pleadings, the Postal Service should not have to provide a response to the McGraw-Hill Companies' interrogatory.

With a substantial number of interrogatories still pending and with hearings fast approaching, the Postal Service should not be required to answer ever more questions about its Rule 54(a)(1) alternate cost presentation, or to make comparisons between that cost presentation and the one it is actually relying upon in its proposals.

- 3 -

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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

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