

DOCKET SECTION

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

RECEIVED  
SEP 29 4 53 PM '97

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO AMERICAN BUSINESS  
PRESS INTERROGATORY ABP/USPS-T13-8(c)  
(September 29, 1997)

The United States Postal Service hereby objects to American Business Press interrogatory ABP/USPS-T13-8(c), filed on September 17, 1997. The information requested is irrelevant, burdensome to produce and may contain commercially sensitive and proprietary matter.

ABP/USPS-T13-8(c) states:

How many USPS highway contractors hold (1) more than 500 contracts (2) 250-500 (3) 100-250 (4) 50-100 (6) 10-25 (7) 1-100?

The requested information is entirely irrelevant to witness Bradley's analysis.

The purpose of witness Bradley's testimony is "to update and refine the analysis of purchased highway transportation done by the Postal Rate Commission . . . in Docket No. R87-1." *USPS-T-5, at 2*. Witness Bradley is not sponsoring a seminar on the Postal Service's management or administration of highway contracts; rather he is estimating variabilities for purchased highway transportation costs. Moreover, even the relevance to the Postal Service's management or administration of highway contracts of how many Postal Service highway contractors hold what number of contracts is obscure, at best.

Much information on the Postal Service's purchased highway contract system has already been provided in this and previous dockets. For example, witness Bradley has responded in this docket to a number of interrogatories concerning the purchased highway transportation system, including responses on flexibility in the purchased transportation network (FGFSA/USPS-T2-42) and on how the need for a change in capacity is determined when a highway contract is about to be bid (FGFSA/USPS-T13-7). As another example, in Docket No. MC97-2, he provided 43 pages of standard Postal Service contract forms in response to interrogatory OCA/USPS-T4-9. In many previous dockets, information on Postal Service purchased highway transportation contracting and management was provided. Information on how many Postal Service highway contractors hold what number of contracts certainly adds nothing of any utility to the record of these proceedings.

Further, the information would either be unduly burdensome to produce or would reveal confidential information. There are several ways to produce the requested information and all present problems. First, each of the DNO's could produce their own listing. This would require transportation personnel at Headquarters to contact each DNO and supervise production of the lists. Some contractors hold highway contracts at several DNO's, meaning that once the lists were produced, additional time would be needed to weed out differences in spelling and those instances where contractors operate under different names, such as a "dba." In fact, it is not clear that any final list produced would be precise because of these very issues. Of course, names of contractors are confidential and would not be revealed. Thus, a

final encryption or summing of the lists into numerical counts (as the interrogatory requests) would be required. It is estimated that this undertaking could take one to two weeks.

Second, data personnel in St. Louis could develop a program to have each of the DNO's extract the information, much the same as the process involved in developing witness Bradley's HCSS data base. It is estimated that this process would take at least one full week and would cost several thousand dollars, assuming that everything worked correctly and no "trial and error" time was needed.

Third, the information could be extracted by taxpayer identification number, but these numbers are confidential and any lists derived on this basis would have to be further encrypted or the totals summed by postal personnel. This would involve preparation of an additional computer program or manual work, either of which could take as much as a week.

ABP has waited until the very last day of discovery to propound this irrelevant and burdensome request. The Postal Service should not have to provide the requested information.

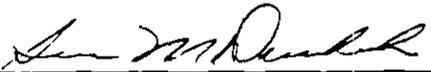
- 4 -

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

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
September 29, 1997