

# DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-T39-17-18)  
(September 29, 1997)

The Postal Service hereby objects to interrogatories DFC/USPS-T39-17-18 to witness Needham, filed by Douglas F. Carlson on September 18, 1997.

Interrogatory DFC/USPS-T39-17 asks witness Needham to confirm that the per-unit manufacturing costs of a single-color stamped card would be less than the cost of a multi-color stamped card. If witness Needham does not confirm, she is to provide all evidence available to support her answer, and provide cost data for the most recent year in which the Postal Service manufactured both a single-color stamped card and a multi-color stamped card. Interrogatory DFC/USPS-T39-18 asks witness Needham to "explain all reasons why the Postal Service stopped printing stamped cards in single-color designs", including an explanation of "the role of a former postmaster general in instigating or encouraging this change."

These interrogatories are objectionable on grounds of relevance. The information sought to be elicited is plainly not material to the issues before the Commission, and is beyond the scope of this proceeding. Procedures and policies related to designs for postal stationery are well within the Postal Service's and the Citizen's Stamp Advisory Committee's discretion. See 39 U.S.C. § 401(a)(4); see also POM § 212.1 (establishing procedures for selection of designs for postal stationery). The Postal Service does not offer single-color postal cards, so their costs

are not relevant to establishing a stamped card fee to cover the actual manufacturing costs for stamped cards. The reasons why the Postal Service stopped offering single-color postal cards is also not relevant to the determination of the appropriate stamped card fee. One suspects that Mr. Carlson wishes to obtain information so as to advise the Postal Service on how to design stamped cards at minimum cost. Such a management issue is beyond the scope of this proceeding.

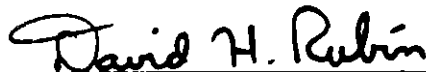
Given that it has been at least 10 years since the Postal Service offered a single-color postal card, it is doubtful whether the historical cost information requested in DFC/USPS-T39-17 exists, and even if it does, the burden imposed on the Postal Service to search for such data would be undue, particularly given the lack of relevance the requested information has on the subject matter of this proceeding. While the requested information may be of interest to philatelists or hobbyists, it simply has no bearing on the Commission's evaluation of the classification and pricing criteria of 39 U.S.C. §§ 3622 and 3623.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

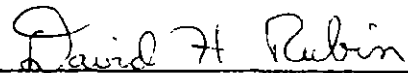
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September 29, 1997

**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.

  
\_\_\_\_\_  
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