

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-183.c-d, 184.a, 185.c-d)  
(July 4, 2005)

The United States Postal Service hereby files objections to the following interrogatories of the Office of the Consumer Advocate, filed on June 23, 2005:

OCA/USPS-183.c-d, 184.a, 185.c-d

The Postal Service intends to answer all of these interrogatories, and believes that its answers will provide the information which OCA is seeking. To the extent that OCA might conclude that the answers are inadequate, the Postal Service objects on the bases of relevance and burden.

All of the objectionable interrogatories ask the Postal Service to recalculate fourteen cost segments for various years, based on its response to OCA/USPS-132(b) concerning registered mail. A quick summary at these interrogatories follows.

OCA/USPS-183.c-d

OCA/USPS-183c asks the Postal Service to confirm OCA's calculated total cost for Registered Mail for BY2000, resulting from the response to OCA/USPS-132(b), based on costs for fourteen different cost segments shown in a table prepared by OCA, or to provide the correct figures.

Similarly, OCA/USPS-183d asks the Postal Service to confirm OCA's calculated total cost for Registered Mail for BY2004, resulting from the response to OCA/USPS-

132(b), based on costs for fourteen different cost segments shown in a table prepared by OCA, or to provide the correct figures.

OCA/USPS-184.a

OCA/USPS-184.a asks the Postal Service to, inter alia, provide for each of three fiscal years, preceding the base year, corrected domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs, and corrected domestic Registered Mail costs for all other cost segments.

OCA/USPS-185.c-d

OCA/USPS-185.c asks the Postal Service to confirm OCA's calculated total cost for Registered Mail for BY2000, resulting from the response to OCA/USPS-132(b), under the PRC costing methodology, based on costs for fourteen different cost segments shown in a table prepared by OCA, or to provide the correct figures.

Similarly, OCA/USPS-185.d asks the Postal Service to confirm OCA's calculated total cost for Registered Mail for BY2004, resulting from the response to OCA/USPS-132(b), under the PRC costing methodology, based on costs for fourteen different cost segments shown in a table prepared by OCA, or to provide the correct figures.

In each question, it appears that OCA is most interested in the total costs for the year in question. By recalculating cost segment 10, which includes the bulk of these costs, and applying piggyback factors for other cost segments, the Postal Service believes it will be able to file a response that addresses OCA's concerns.

However, should OCA deem the responses to be inadequate, the Postal Service objects on the bases of burden and relevance. To recalculate the thirteen cost segments other than cost segment 10 would take an estimated one week of workhours for each year. This is an unreasonable burden considering the minimal impact they will have on the total costs, and the fact that an application of piggyback factors can achieve virtually the same result. Moreover, these thirteen other factors are not relevant considering their minimal impact on the total costs.

Therefore, the Postal Service will provide a response to these interrogatories, but

preserves its objections in case the responses are deemed inadequate by OCA.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Brian M. Reimer

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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