

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

MOTION FOR LATE ACCEPTANCE OF AND
OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY UPS/USPS-T37-78(B)
(October 1, 1997)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T37-78(b), directed to witness Mayes on September 17, 1997, and moves to have this objection accepted two days late. The delay was caused by the effort to complete the Postal Service's Trial Brief in a timely fashion and continue to monitor and file responses to the large number of interrogatories due this week. It was also not readily apparent until some preliminary analysis was done that responding to the interrogatory would require the provision of privileged information.

In response to UPS/USPS-T37-39, the Postal Service filed two charts providing the FY 1996 volume of intra-BMC Parcel Post that originated and destinated within the service area of each BMC and ASF, and the volumes of Parcel Post that flowed between the service areas of the origin BMC or ASF and each destination BMC or ASF. In order to protect the interests of the Postal Service, in keeping with past practices of not providing volumes to and/or from particular postal facilities, the BMCs and ASFs were identified by randomly assigned numbers rather than their locations or names. The two charts filed in response to UPS/USPS-T37-39 complemented Attachment S of Library Reference H-135, which provided similar information for the FY 1996 volume of Parcel Post that was entered as DBMC mail at each of the BMCs and ASFs.

In its interrogatory UPS/USPS-T37-78, UPS first requests confirmation that the reference numbers are identical across all three charts. In part (b) of that interrogatory, UPS requests that if the reference numbers are not identical across all three charts, that the Postal Service "provide compatible reference numbers for each BMC and ASF." The Postal Service objects to this question on the grounds that to provide such matching codes would permit UPS to associate the DBMC volume, intra-BMC volume and originating and destinating volume with particular BMC and ASF service areas. In particular, as was pointed out in its question (c) of the same interrogatory, there are only 8 ASFs listed in Attachment S of Library Reference H-135, whereas there are 11 listed in the charts provided in response to UPS/USPS-T37-39. If the reference numbers were provided to match the ASF codes, it would become readily apparent to volumes were associated with the 3 ASFs in the charts supplied in response to UPS/USPS-T37-39 but not listed in Attachment S of Library Reference H-135. The Postal Service considers provision of this information, which would permit identification of the volumes of mail originating and destinating from particular facilities to be privileged.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 1, 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 black ink, appearing to read "Scott L. Reiter", written in a cursive style.

Scott L. Reiter

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October 1, 1997