

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION  
NNA/USPS-T1-32

The United States Postal Service hereby objects partially to an interrogatory filed by the National Newspaper Association: NNA/USPS-T1-32. The interrogatory states:

**NNA/USPS-T1-32** In your response to NNA/USPS-T1-18, you indicate that “Westmoreland News was inadvertently included among the inconsistent tallies. Later processing with a more complete data base eventually enabled this tally to be verified automatically.” With respect to this response, please explain fully what you mean by “a more complete data base” and provide the earlier, less complete data base in PC SAS format.

The Postal Service objects to the request for an “earlier, less complete data base in PC SAS format,” on the grounds of relevance. The Postal Service provides many data sets in an omnibus proceeding, virtually all of which have undergone extensive processing to eliminate errors and inconsistencies, and therefore provide to participants and the Commission the highest quality data that it can.

Interrogatory NNA/USPS-T1-18, referenced in the body of NNA/USPS-T1-32, inquired about an apparent inconsistency found in documentation of the various processing steps for IOCS. Witness Czigler’s response acknowledged the inconsistency and explained it as deriving from the fact the documentation of one processing step was a preliminary, rather than final, version. The response also explained the affected workbook “will be revised” to provide the final version.

In lieu of awaiting that revision, NNA seeks in interrogatory NNA/USPS-T1-32 the preliminary data set that was documented in the non-final workbook. The Postal Service

accordingly objects to opening the door to the thousands of preliminary data sets that were used before final versions were produced for use by the Commission. As such, grounds for the partial objection include the fact that the database sought is of less utility than the one already provided; it would be largely duplicative, but with diminished utility. Furthermore, producing multiple data bases would burden the evidentiary record with confusing material, adding unnecessary burden and complexity.

Witness Czigler is quite prepared to answer the interrogatory's request for an explanation of what constitutes "a more complete database," thereby providing NNA with a better understanding of the error. Preliminary data sets, however, can only detract from the record evidence and should accordingly be avoided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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