

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF  
UNITED PARCEL SERVICE TO WITNESS BOZZO (USPS-T-12):  
UPS/USPS-T12-48 and 49  
(August 18, 2006)**

The United States Postal Service hereby objects to the above-referenced interrogatories, directed to witness Bozzo (USPS-T-12) on August 7, 2006. The interrogatories seek the following from the witness:

UPS/USPS-T12-48. For each of the following functions, provide the total labor hours from the MODS database for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations Support;
- (b) 1, Mail Processing;
- (c) 2, Delivery Services;
- (d) 3, Maintenance;
- (e) 4, Customer Services;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Services Support;
- (i) 8, Administration;
- (j) 9, Training; and
- (k) Special Operations.

UPS/USPS-T12-49. For each of the following LDCs, provide total labor hours and total labor costs from the National Workhours Reporting System for every quarter from FY1999 Q1 through FY2005 Q4 and for each IDNUM listed in vv9905.xls of Section1/data of USPS-LR-L-56:

- (a) 0, Operations–Support;
- (b) 1, Operations–Mail Processing;
- (c) 2, Operations–Delivery Services;
- (d) 3, Operations–Maintenance/Transportation;

- (e) 4, Operations–Customer Service;
- (f) 5, Finance;
- (g) 6, Human Resources;
- (h) 7, Customer Service and Sales;
- (i) 8, Administration (Field);
- (j) 8, Headquarters General Management (HQ and Related Units); and
- (k) 9, Training.

The Postal Service objects to these interrogatories on several grounds. First, they were submitted 24 days after the close of discovery on the Postal Service’s direct case.

Second, they are not follow-up interrogatories under the Commission’s Rules of Practice. 39 C.F.R. §§ 3001.26 indicates that “follow-up interrogatories to clarify or elaborate on the answer to an earlier discovery request may be filed after the initial discovery period ends. They must be filed within seven days of receipt of the answer to the previous interrogatory unless extraordinary circumstances are shown.” These interrogatories do not ask for clarification or elaboration of the answer(s) to earlier discovery request(s). They were filed at least ten days after receipt of answers provided in accord with the discovery period. No extraordinary circumstances are indicated.

Third, the interrogatories are unduly burdensome. They request a superset of NWRS data beyond the Function 1 LDCs that are provided in witness Bozzo’s USPS-LR-L-56. These data have not been assembled previously. The amount of effort involved in producing the requested data set is unknown, but past experience in working with newly assembled data sets suggests the likely need for extensive review and work after the set initially is assembled.

For these reasons, the Postal Service respectfully objects to providing responses to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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