

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

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POSTAL RATE AND FEE CHANGES, 1997

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**OBJECTIONS OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY 17 OF ALLIANCE OF NONPROFIT MAILERS  
(November 13, 1997)**

On November 7, 1997, the Alliance of Nonprofit Mailers (ANM) filed interrogatory ANM/USPS-17 directed to the Postal Service.<sup>1</sup> This interrogatory requests:

For all newly offered testimony, including especially all Library References that the Postal Service has now or expects to sponsor into evidence and all exhibits thereto, please provide for all numbers used, but not derived therein, citations to the document, page, line column, etc., which is the source of the number. Citations should be sufficient to permit the Alliance of Nonprofit Mailers and other parties to trace any such number back to published documents or, if not obtained from published documents, to primary data sources.

This interrogatory is similar in approach and substance to interrogatories ANM/USPS-1-16, filed earlier in this proceeding, to which the Postal Service objected on November 4, 1997. The Postal Service objects to interrogatory 17 on the same general grounds as the earlier objections. In addition, the Postal Service makes the following specific objections:

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<sup>1</sup> Presumably, this interrogatory was filed pursuant to Commission Order No. 1200, which allowed a limited extension of discovery related to materials identified in the United States Postal Service Response to Presiding Officer's Ruling No. R97-1/42. That order states that the Postal Service "should endeavor to prepare and submit responses within seven days," but does not specify a timeline for objections. The Postal Service therefore has prepared and filed its objections with the greatest expedition possible.

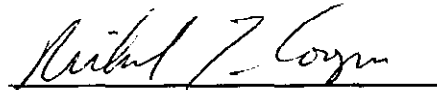
This interrogatory is not reasonably calculated to lead to the production of admissible evidence because it proceeds from the false premise that the items sought pertain to each testimony and library reference, is overbroad and requests irrelevant information. It would also impose an undue burden on the Postal Service in that it would require the Postal Service to review a large volume of information already available to ANM, and extract and reiterate documentation already provided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

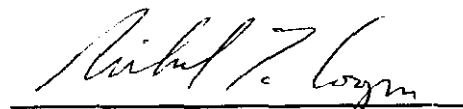
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, SW  
Washington, D.C. 20260-1137  
(202)268-2998/FAX: -5402  
November 13, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

475 L'Enfant Plaza West, SW  
Washington, D.C. 20260-1145  
November 13, 1997