

# DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

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

**OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON  
(DFC/USPS- 23)**

The United States Postal Service hereby files this objection to the following interrogatory of Douglas Carlson, dated November 24, 1997: DFC/USPS-23.

The interrogatory asks the Postal Service to provide "the posted and scheduled Saturday collection times for the collection boxes that are located outside the post office in Emeryville, California."

The Postal Service objects to this interrogatory as not being reasonably calculated to lead to the discovery of admissible evidence on any matter which is material or relevant to any issue in this proceeding.

Whatever the posted/scheduled Saturday collection times may be on any collection boxes outside the Emeryville Post Office, the relationship between this information and any of the costing and pricing issues before the Commission is so attenuated as to render the requested information irrelevant. Accordingly, the Postal Service believes that it is not obliged by the Commission's rules to respond to this interrogatory.

In contrast to other information sought by Mr. Carlson through discovery in this proceeding,<sup>1</sup> the information sought by this interrogatory is, presumably, publicly

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<sup>1</sup>And, for purposes of the instant objection, putting aside whether any of his other information requests constitute proper discovery.

displayed on the collection boxes in question and, therefore, available for around-the-clock review by all persons with a heightened interest in the operations of the Emeryville Post Office.<sup>2</sup> Accordingly, Mr. Carlson may attempt to obtain access to this information by examining these collection boxes at his convenience, without the intervention or assistance of a postal employee. Otherwise, he is reminded that requests for information directed to the Postal Service which are related to issues in this proceeding should be directed through Postal Service counsel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

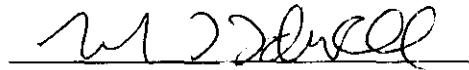


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December 8, 1997

#### 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.



Michael T. Tidwell

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December 8, 1997

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<sup>2</sup> Even if that is not the case, the information is still not relevant to any issue in this proceeding.