

ORIGINAL

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

RECEIVE

Nov 20 4 29

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. MC98-1

MAILING ONLINE SERVICE

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OCA/USPS-6  
(November 20, 1998)

The United States Postal Service hereby objects to interrogatory OCA/USPS-6, filed on November 13, 1998. The interrogatory seeks items mentioned in or related to the Netpost research and development contract. This contract was filed as Library Reference USPS-LR-7 on August 3, 1998, in response to interrogatory OCA/USPS-T1-10(c) by witness Garvey.

The interrogatory is untimely and unauthorized. The period for discovery on the Postal Service's direct case ended on November 9. The OCA had more than three months between August 3 and November 9 to follow up on witness Garvey's response to OCA/USPS-T1-10.

The period for extended discovery against the Postal Service, scheduled through January 19, does not provide a basis for this interrogatory. Such discovery is normally authorized by Special Rule 2.E., adopted in several cases in recent years. Such discovery "enable[s] a participant to obtain information available only from the Postal Service for the purpose of developing rebuttal testimony." See, e.g., P.O. Rulings No. R97-1/85 and 89. Although no special rules were promulgated in this docket, the Presiding Officer reconfirmed at hearings this morning that the extended discovery period is for essentially the same purposes.



The OCA's interrogatory does not appear to be seeking information needed for the OCA's preparation of testimony. Rather, it appears that the OCA is simply attempting to follow up interrogatory answers that were filed months ago.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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Scott L. Reiter

### 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.



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Scott L. Reiter

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