

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF TIME WARNER INC. (TW/USPS-T20-1)
(June 13, 2005)

The United States Postal Service hereby partially objects to interrogatory TW/USPS-T20-1, submitted by Time Warner Inc. on June 1, 2005. The interrogatory reads as follows:

TW/USPS-T20-1. Please provide a list of MODS numbers used to describe BMC operations, along with a description of what each numbered operation consists of. Additionally, please indicate for each operations the BMC MODS measures volume. Also, for the portion FY2005 for which records are available, please provide a table, in Excel format, of the total volumes (when applicable) and workhours recorded under each MODS operation in the BMCs.

The Postal Service objects, on the grounds of relevance, to the part of this interrogatory that requests FY 2005 volume and work hour data for each MODS operation in the Bulk Mail Centers (BMCs). FY 2004 is the base year in this proceeding, which means that FY 2005 data was not used or relied upon by the Postal Service. Parties should not be allowed to request and obtain partial year data beyond the base year as the case progresses; otherwise, the entire ratemaking exercise would be transformed into an attempt to shoot at a moving target.

The Postal Service therefore partially objects to this interrogatory on the grounds of relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252; Fax -3084
keith.e.weidner@usps.gov