

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

NOTICE OF UNITED STATES POSTAL SERVICE OF FILING REPLACEMENT
PARTIAL OBJECTION TO
INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION
ERRATUM

The United States Postal Service hereby gives notice of the filing of a replacement Partial Objection of United States Postal Service To Interrogatory of the National Newspaper Association (Revised). Earlier today, the Postal Service inadvertently filed an earlier draft of that objection, rather than the later version that better explains the Postal Service position. The later version actually constitutes a retrenchment in that the Postal Service determined to be more responsive than reflected in the earlier draft version. The revised Partial Objection of United States Postal Service to Interrogatory of the National Newspaper Association (revised) is attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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July 24, 2006

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PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION (REVISED)
NNA/USPS-T1-32

The United States Postal Service hereby objects partially to an interrogatory filed by the National Newspaper Association: NNA/USPS-T1-32. The interrogatory states:

NNA/USPS-T1-32 In your response to NNA/USPS-T1-18, you indicate that “Westmoreland News was inadvertently included among the inconsistent tallies. Later processing with a more complete data base eventually enabled this tally to be verified automatically.” With respect to this response, please explain fully what you mean by “a more complete data base” and provide the earlier, less complete data base in PC SAS format.

The Postal Service objects to any request that seeks to explore preliminary datasets on the grounds of relevance and burden. The Postal Service provided the correct data set by filing errata to USPS-LR-L-9 two days before the interrogatory from National Newspaper Association was filed. Thousands of preliminary data sets underlie the Postal Service’s direct case; responding to discovery about these is inherently unproductive and will only complicate an already complex evidentiary record. Virtually all of the costing data sets have undergone extensive processing to eliminate errors and inconsistencies, and thereby provide to participants and the Commission the highest quality data possible. The potential burden of responding to interrogatories about preliminary data sets would be enormous.

Interrogatory NNA/USPS-T1-18, referenced in the body of NNA/USPS-T1-32, inquired about an apparent inconsistency found in documentation of the various processing steps for IOCS. Witness Czigler’s response acknowledged the inconsistency and explained it as deriving from the fact the documentation of one processing step was a preliminary, rather than final,

version. The response also explained that the affected workbook would be revised to provide the final version, as it was on July 10, 2006.

On July 12, NNA filed interrogatory NNA/USPS-T1-32 requesting a further explanation and the preliminary data set that was documented in the non-final workbook. The Postal Service accordingly objects to opening the door to the thousands of preliminary data sets that were used before final versions were produced for use by the Commission. As such, grounds for the objection include the fact that the database sought is of less utility than the one already provided; it would be largely duplicative, but with diminished utility. The Commission's rules do not require, or for obvious reasons expect, results of inchoate versions of the analysis to be provided. Furthermore, producing multiple data bases would burden the evidentiary record with confusing material, adding unnecessary burden and complexity.

In this instance, however, the Postal Service did inadvertently document a preliminary data set; accordingly, the Postal Service's objection is only partial. In these circumstances, the questions can be answered fairly readily, and the requested data set has already been filed with the Commission. But the Postal Service preserves its objection to questions about preliminary data sets and will object fully to any further questions relating to this subject.

Respectfully submitted,

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