

the wrong witness are largely makeweights. As set forth in the proposed rule, the roadmap testimony simply provides an overview of the Postal Service's filing. Participants are unlikely to confuse that purpose with the role played by witnesses sponsoring the more substantive aspects of the testimony on point. However, even if on occasion an interrogatory is directed to the wrong witness, the solution is simple. The Postal Service is well practiced at redirecting interrogatories to the appropriate witness, and the roadmap witness should be especially familiar with which witness addresses a particular topic. Hence, the Postal Service's argument provides no basis to reject the roadmap testimony.

The Postal Service expresses concern that the roadmap witness would, in effect, be sponsoring testimony regarding PRC methodologies when addressing material changes to the preexisting PRC versions proposed by the Postal Service in that proceeding.¹² The comparison required by this exercise cannot be equated with sponsoring the preexisting methodology. It merely identifies and gives context to the proposed change, serving as a benchmark so that the impact can be assessed. Testimony by the roadmap witness describes the areas of change. This does not amount to sponsoring the preexisting methodology. Similarly, witnesses submitting testimony under rule 53(c) sponsor the proposed methodological changes, not the preexisting methodology. That they may be compelled to reference the preexisting methodology does not mean they are sponsoring it.¹³

Interrelationships among testimonies. The Postal Service suggests the format and level of detail that would, in its view, satisfy the intent of the proposed rule to provide an overview of its filing.¹⁴ For example, the Postal Service states that a roadmap explaining the functional components of the case, including identifying testimonies that addressed each component, would appear to provide a sufficient overview of its filing in conformance with the proposed rule, except as relates to methodological changes.¹⁵ While it states that one might quibble over whether such a document would adequately explain how the testimonies

interrelate, it believes that "the description of the functional organization of the filing would encapsulate the informational flows that define the interrelationships [among] the testimonies."¹⁶ Further, it indicates that it would have no difficulty summarizing sources of material inputs, including outputs used as inputs, employed by its various witnesses.¹⁷

In order no. 1355, the Commission, illustratively citing the testimony of witness Van-Ty-Smith in docket no. R2001-1, observed that she briefly notes that certain witnesses use her mail processing volume-variable costs. The order concludes that "something more" would be required of the roadmap witness.¹⁸

Quoting an excerpt from Van-Ty-Smith's testimony, the Postal Service questions what more would be required of it to satisfy this facet of the proposed rule.¹⁹ Order no. 1355, as pointed out by the OCA, expands on the statement:²⁰ "Specifically, the roadmap witness's overview of the Postal Service's filing would identify the subject matter of each witness's testimony, explain how the testimony of the various witnesses interrelates, and highlight changes in cost methodology, volume estimation and rate design." See proposed § 3001.53(b). Thus, with reference to Van-Ty-Smith's testimony, the roadmap witness would, among other things, explain the linkage between her analysis and the testimony of those witnesses who rely on it.

The roadmap testimony should provide a coherent overview of the Postal Service's filing. To be sure, the excerpt from Van-Ty-Smith's testimony does identify some interrelationship between her testimony and that of other witnesses. Certain interrelationships are reasonably clear, e.g., the description regarding witness Kay's development of incremental costs and Meehan's base year costs. It is less clear, however, regarding the "updates [of] other types of information coming out of the methodology for mail processing costs which are used by other witnesses, such as [Smith, Mayes, Eggleston, and Miller], as the source of inputs for some of their cost studies."²¹ While the statement would alert the reader that some relationship exists between Van-Ty-Smith's and the referenced testimony, it lacks specifics other than

a general reference to cost studies. Moreover, the statement is somewhat qualified, referring to witnesses "such as" Smith, *et al.*, and that the inputs are used in "some of their cost studies."²²

As written, that testimony falls short of explaining the linkage between Van-Ty-Smith's analysis and the testimony of those witnesses who rely on it. The Commission recognizes, of course, that the testimony was not written with the proposed rule in mind. Moreover, as the Postal Service suggests, the foregoing description might be sufficient "[i]n the context of a comprehensive roadmap * * * because any potential questions with respect to the more specific purposes of, for example, the testimony of witness Miller, could be quickly resolved by other information within the roadmap document discussing Mr. Miller's cost study testimony."²³ Thus, if the linkages to Van-Ty-Smith's testimony are adequately detailed in the portion of the roadmap testimony that addresses, for example, witness Miller's testimony, the proposed rule would be satisfied.

The description in the roadmap testimony is not a surrogate for the underlying testimony of the witness referenced, e.g., Miller's testimony in docket no. R2001-1, USPS-T-22. It should, however, be sufficiently detailed to explain linkages between the two testimonies. This does not mean that the roadmap testimony is to function as a cross-referencing vehicle. That function, as the Postal Service notes, is "fulfilled by the complete documentation submitted by each witness."²⁴

In sum, the roadmap testimony is intended to facilitate consideration of complex rate and classification requests by providing participants with an overview of the filing, including identifying changes in methodology. It should enable participants to focus more quickly on issues affecting rates (or service) of concern to them. The level of detail to be included in the roadmap testimony undoubtedly will evolve over time. Based on its comments, the Postal Service appears committed to making a good faith effort to comply with the rules. The Commission would expect no less and, based on experience, believes that Postal Service adheres to that standard in matters before the Commission.

Changes in methodology. Under the proposed rule, the roadmap testimony would highlight changes in cost methodology, volume estimation, and

¹² Postal Service Comments at 4-5.

¹³ As the OCA notes, "The Postal Service witness is obviously not deemed to be sponsoring the PRC version; only explaining how the Postal Service's presentation relates to the Commission's methodologies." OCA Reply Comments at 5.

¹⁴ See Postal Service Comments at 6-12.

¹⁵ *Id.* at 7-8.

¹⁶ *Id.* at 8.

¹⁷ *Ibid.*

¹⁸ PRC Order No. 1355, December 12, 2002, at 7.

¹⁹ Postal Service Comments at 7-8.

²⁰ PRC Order No. 1355, December 12, 2002, at 7-8.

²¹ Postal Service Comments at 9, quoting USPS-T-13 at 1.

²² *Ibid.*

²³ *Id.* at 9.

²⁴ *Id.* at 10.