

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

OBJECTION OF UNITED STATES POSTAL SERVICE TO
OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES
OCA/USPS-T7-27(A) AND OCA/USPS-T7-30
(August 2, 1996)

The United States Postal Service hereby objects to the Office of the Consumer Advocate's (OCA's) interrogatories OCA/USPS-T7-27(a), filed on July 23, 1996, and OCA/USPS-T7-30, filed on August 1, 1996. Interrogatory OCA/USPS-T7-27(a) requests witness Needham to "confirm that there are no restrictions in the DMM or DMCS that would prevent the Postal Service from giving priority to residents" in assigning post office boxes. Interrogatory OCA/USPS-T7-30 asks witness Needham whether "there are any applicable international treaties or agreements which would prevent limiting the non-resident fee to foreign nationals, whether businesses or individuals", and if so, that she provide citations. These interrogatories call for legal conclusions from the witness, concerning OCA alternatives to witness Needham's proposal for a non-resident fee. These interrogatories address topics better left to lawyers, rather than discovery on a pricing witness.

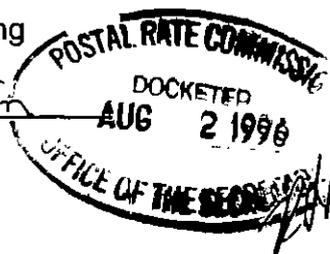
Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

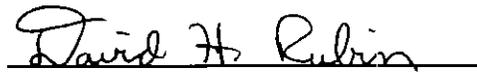
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
David H. Rubin



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.


David H. Rubin

475 L'Enfant Plaza West, S.W.
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August 2, 1996