

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE UNITED PARCEL SERVICE, UPS/USPS-T16-4
(March 3, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T16-4, filed February 23, 2000 on the grounds of relevance and commercial sensitivity.

The interrogatory references library reference USPS-LR-I-12 (IOCS source code and data, the subject of witness Ramage's testimony, USPS-T-2) and asks for a version of the IOCS data file that includes variables which were not used in development of the CRA. Since they were not used to develop the CRA, they are by their very nature irrelevant. Moreover, the information identifies individual employees and facilities, and also includes detailed international data. Thus, in addition to being irrelevant, all three types of information are commercially sensitive. This combination is exactly why the requested information was not provided in the first place and has not previously been provided in other rate proceedings.

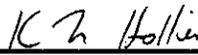
WHEREFORE, the United States Postal Service objects to interrogatory
UPS/USPS-T16-4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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.



Kenneth N. Hollies

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March 3, 2000