

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

**PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE ASSOCIATION OF NONPROFIT MAILERS,
ANM/USPS-T2-1, 10
(March 3, 2000)**

The United States Postal Service hereby objects partially to interrogatories ANM/USPS-T2-1 and 10, filed February 23, 2000 on the dual grounds of burden and relevance.

Interrogatory ANM/USPS-T2-1 asks for a breakdown of IOCS tallies into direct, mixed and not handling, for Cost Segments 3.1 and 6.1, and separately for carrier route and nonprofit Standard A, for each of fiscal years 1990 through 1999. Responding affirmatively to the totality of this inquiry would require weeks to months of work, even assuming all the data were available – which they are not. Moreover, years may not be comparable to one another, an issue that would require further research. However, the Postal Service is able to provide a response that provides three years of data from the base years in Docket Nos. R2000-1, R97-1, and R94-1. The thrust of the question seems to be the conduct of a trend analysis, and the information provided is responsive.

Interrogatory ANM/USPS-T2-10 inquires about the distribution of CVs for the Cost Segment 3.1 values reported in USPS-T-2, Table 1, over fiscal years 1990 through 1998. Even more than with ANM/USPS-T2-1, responding to this interrogatory would require exclusive devotion of weeks, if not months of work. However, values

from the test years in Docket Nos. R2000-1, R97-1, and R94-1 can and will be provided.

WHEREFORE, the United States Postal Service objects partially to interrogatories ANM/USPS-T2-1 and 10.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

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