

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

RECEIVED
MAR 3 4 59 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE CONTINUITY SHIPPERS ASSOCIATION
TO WITNESS EGGLESTON (CSA/USPS-T26-1, 2 & 13)
(March 3, 2000)

The United States Postal Service hereby objects to the following interrogatories of the Continuity Shippers Association to witness Eggleston, filed on February 22, 2000: CSA/USPS-T26-1, 2 & 13.

Interrogatory 1 asks for the "names of all current users of the Bulk Parcel Return Service ("BPRS")" and interrogatory 2 asks the witness to "identify the BPRS mailers 1-8 listed on page 31 of your testimony." The Postal Service objects to these interrogatories as seeking irrelevant and privileged information. First, identification of the names of postal customers has no relevance to the issues before the Commission in this case. Second, 39 U.S.C. § 412 prohibits the Postal Service from disclosing the names of postal customers. Third, it has been longstanding practice not to associate the names of postal customers with data collected in postal cost studies and other similar analyses. Such information could be considered by the customers to be trade secrets and could have commercial value to the customers' competitors or others. The Postal Service depends on the willingness of mailers to participate in cost studies. If the Postal Service were to release information about specific mailers, it might be impossible for it to enlist the cooperation of mailers in conducting studies in the future.

Interrogatory 13 states that the Postal Service stated at two meetings held in the 1995, including the September 1995 MTAC meeting, "its intention to file an experimental bulk merchandise return service for third class mail." The interrogatory

then asks for "all documents relating to the experimental Third Class bulk merchandise return service, including but not limited to justifications, cost studies, management reports, etc.," and what the rate was to be, and how the Postal Service determined that rate. Any such information that might have ever existed or that may still exist is completely irrelevant to the current case. It would also be privileged as part of the pre-decisional deliberative process. Such a case was never filed. Instead, the Postal Service proposed, first in the Parcel Reform Case (Docket No. MC97-2) that was withdrawn, and then in Docket No. MC97-4, a permanent service for return of Standard Mail (A) parcels. This service—BPRS—is now an established service and the only proposal relating to it before the Commission at this time is a change in the fees for the service. Any past proposals for experiments that never came to be and that were superseded by an existing service have no relevance to this proceeding.

Accordingly, the Postal Service objects to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

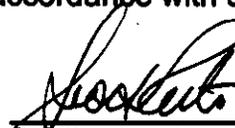


Scott L. Reiter

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.

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
March 3, 2000



Scott L. Reiter