

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T28-20)

The United States Postal Service hereby files this partial objection to the following interrogatory directed by United Parcel Service to witness Moeller on November 7, 2001: UPS/USPS-T28-20.

The interrogatory requests copies of each quarterly External First-Class Mail Measurement System (EXFC) quarterly report issued since the beginning of FY 2000.

The Postal Service objects to the disclosure of data contained in these reports which reflecting originating and destinating service performance at the Area and Performance Cluster level. Service performance scores at the Area and Performance Cluster level are irrelevant to the issues before the Commission in this proceeding.

The Postal Service also objects to the disclosure of data reflecting service performance between Performance Clusters. In addition to being irrelevant to postal ratemaking, such point-to-point data are commercially sensitive and privileged.¹

¹As explained in the Docket No. C2001-3, USPS Reply to Douglas Carlson Answer In Opposition to Application of Protective Conditions to the Response to DFC/USPS-9 (December 10, 2001).

The Postal Service intends to respond to UPS/USPS-20 by providing all National level data included in the requested reports and redacting Area and Performance Cluster service performance data.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

Michael T. Tidwell

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.

Michael T. Tidwell

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December 31, 2001