

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

RECEIVED
MAR 30 4 40 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO CARLSON INTERROGATORY DFC/USPS-70

The Postal Service hereby objects to the following interrogatory filed by Mr. Carlson on March 20, 2000, and directed to the Postal Service: DFC/USPS-70.

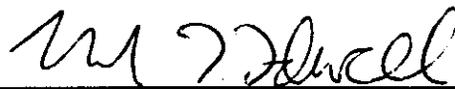
This interrogatory asks the Postal Service to "provide recent national EXFC performance data for every category available (e.g., flats, letters, SPR's; handwritten, typewritten, bar-coded; etc.)."

First-Class Mail service performance data are relevant to the determination of "value of service" for First-Class Mail, as a whole, within the meaning of 39 U.S.C. § 3622(b)(2). Because the "value of service" determination is made at the subclass level, the aggregate national average EXFC score is a relevant consideration. Since "value of service" determinations in postal ratemaking are made with respect to a subclass as a whole, disaggregated data by type of First-Class Mail piece are neither relevant nor material. Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
March 30, 2000

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
March 30, 2000