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

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OCA/USPS-88i and j (October 28, 1996)

On October 26, 1996, the Office of the Consumer Advocate (OCA) filed interrogatory OCA/USPS-88. Subparts i and j of that interrogatory request, in lieu of certain requested information, a copy of the SAS data set FMSRTE from LR-SSR-99.

The Postal Service believes it can provide a responsive answer to these interrogatories by providing a redacted form of FMSRTE. Redactions are necessary in order to protect the confidentiality of, for example, finance numbers and ZIP Codes that otherwise appear in the data set. However, it is believed that the redacted form of FMSRTE, together with information already attached to the interrogatory, can be used to generate complete answers to OCA/USPS-88i and j, as well as certain later subparts.

This partial objection extends only to the data being redacted from FMSRTE. The interrogatory subparts explicitly request a copy of that data set, which in its full form contains sensitive information. Accordingly a redacted form of that file will be produced which meets the substantive thrust of the question while not actually compromising any confidential information. Should the redacted form of FMSRTE somehow not meet its intended purpose, the Postal Service would be amenable to an informal approach to resolve any problems.



WHEREFORE, the United States Postal Service partially objects to interrogatory OCA/USPS-88i and j.

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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