

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

RECEIVED
Jan 31 4 31 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
UNITED PARCEL SERVICE, UPS/USPS-T5-3-4
(January 31, 00)**

The United States Postal Service hereby objects to two United Parcel Service interrogatories, UPS/USPS-T5-3-4, on the grounds of burden, relevance and commercial sensitivity.

The two interrogatories basically ask the Postal Service to identify all of its post offices and sort them into buckets of those whose data inform BRPW via participation in the BRPW panel and those who do not, in a way that could lead to identifying where parcels enter the mail processing system. With a universe of 25,000 offices, many of whose BRPW volume would need to be identified separately, the burden and commercial sensitivity are patent. Moreover, counsel is unable at this time to recognize a reason why the information would be relevant to an omnibus rate case.

Notwithstanding, counsel for the Postal Service will contact counsel for UPS in

an effort to determine the purpose of the interrogatories, and whether that purpose can be accommodated without further need for motions practice.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
January 19, 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.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 31, 2000