

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION
(DMA/USPS-T21-5)**

So as not to waive objections to follow-up discovery, the Postal Service hereby lodges a partial objection to Direct Marketing Association (DMA) interrogatory DMA/USPS-T21-5. Interrogatory T21-5 states:

By what percent did the unit city carrier in-office cost for Standard (A) Regular flats increase from FY 1997 to FY 1998? What was the unit cost in FY 1997? What was it in FY 1998?

To the extent this interrogatory requires the production or analysis of data from FY97, the Postal Service objects on grounds of relevance. FY97 costs are not at issue in this proceeding, as *FY 98* is the base year in this proceeding. Further, the Postal Service objects to the extent this interrogatory requires postal witnesses to create new data in order to respond to discovery requests.

Nevertheless, in the spirit of cooperation, the Postal Service intends to respond to interrogatory T21-5 in its entirety. By so doing, it neither intends to waive its right to object to follow-up discovery on interrogatory T21-5, nor does it intend to create a precedent of responding to interrogatories that require postal witnesses to produce new data in order to respond to discovery.


The undersigned counsel has sent a copy of this document to counsel for
DMA via facsimile transmission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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February 7, 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.



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