

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

RECEIVED
FEB 14 4 30 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 UPS INTERROGATORIES UPS/USPS-T13-1 AND 2
TO WITNESS RAYMOND
(February 14, 2000)

The United States Postal Service hereby objects to interrogatories UPS/USPS-T13-1 and 2, filed on February 3, 2000. Interrogatory 1 requests copies of the final report and all interim reports regarding carrier activities developed as a result of the Engineered Standards/Delivery Redesign project. Although the Postal Service has not had sufficient time in which to identify all documents potentially responsive to this request,¹ the information uncovered thus far consists of confidential information collected in part to support negotiations with postal labor unions. Release of such information to the general public could adversely affect the bargaining position of the Postal Service in future negotiations. Responsive reports are also may contain facility-specific or otherwise confidential business information whose unrestricted disclosure could compromise legitimate business interests of the Postal Service. The Postal Service therefore objects to provision of the requested information.

Interrogatory 2, referring to time standards mentioned in witness Raymond's testimony, asks for (a) the purpose of the time standards, (b) final or interim standards

¹ Although clarification of the scope of information sought by UPS was informally provided during discussions between counsel, undersigned counsel is informed that over 200 linear feet of documents will need to be reviewed in order to search for the requested information. It is unclear at this point how long will be needed to complete this review. For the present time, however, the Postal Service reserves the right to maintain an undue burden objection in connection with the production of this information.

produced by the Engineered Standards/Delivery Redesign project, (c) an explanation of how these time standards are used by the Postal Service, and (d) the standards currently being used.

The Postal Service again objects on the ground that the information requested consists of confidential information produced in support of negotiations with postal labor unions. Release of such information to the general public at this time could adversely affect the bargaining position of the Postal Service in future negotiations.

The Postal Service is, however, in the process of collecting and reviewing information potentially falling within the scope of these interrogatories, and will attempt to determine which portions of that information, if any, do not involve the objectionable characteristics mentioned above. If such portions are discovered, the Postal Service will attempt, under appropriate conditions, to make such portions available to the requesting party. In order to preserve its procedural rights at this juncture, however, the Postal Service must object to the interrogatories in full.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
February 14, 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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
February 14, 2000