

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

**UNITED STATES POSTAL SERVICE OBJECTION  
TO INTERROGATORY OCA/USPS-56**

On February 8, 2000, the Office of the Consumer Advocate filed interrogatory OCA/USPS-56. Subparts (a) through (d) of interrogatory 56 request that the Postal Service produce copies of a financial performance review by the Inspector General dated December 3, 1999, and a letter dated November 30, 1999, from Postal Service management to the Office of Inspector General, relating to the Postal Service's International Collection program. The International Collection program is a Postal Service philatelic program whereby the Postal Service markets the stamp products of foreign postal administrations to Postal Service customers.

The Postal Service objects to subparts (a) through (d) on grounds of relevance and commercial sensitivity (in part). The financial performance of philatelic programs, which are nonpostal services, are not related to the rate and classification proposals before the Commission. Furthermore, to the extent the OCA requests an unredacted version of the Inspector General report that contains information that would otherwise be exempt under FOIA, including information on commissions paid to the Postal Service by foreign postal administrations, the Postal Service objects on grounds of commercial sensitivity. Such information is subject to nondisclosure provisions of agreements executed

with foreign postal administrations and constitutes commercially sensitive information.

The Postal Service also objects to subparts (e) through (h) of interrogatory 56 on grounds of relevance, burden, overbreadth, vagueness, commercial sensitivity, and privilege. Subparts (e) and (f) ask that the Postal Service produce all documents prepared by the Inspector General and the Inspection Service dating since September 30, 1996, "relating to lack of budgetary or cost controls within the Postal Service or any of its organizational subdivisions." Subparts (g) and (h) ask that the Postal Service produce all documents prepared by the Inspector General and the Inspection Service "relating to costs or expenses not properly charged under the Postal Service's accounting system." These requests are far too broad. In essence, these subparts require that the Postal Service produce virtually all documents generated by the offices of the Inspector General and the Inspection Service relating to the vast majority of their work product, if not all of the work product of the Inspector General's office, over a three and one half year period. Preparing a response would therefore require the production of not only the hundreds of reports prepared by these units over this time period, but also all of the underlying documents generated by the Inspector General's office and the Inspection Service related to financial and budgetary investigations during this period. This amounts to thousands upon thousands of pages of documents too numerous to quantify. The burden involved in collecting, sorting, and copying documents responsive to these subparts would be enormous and involve hundreds or thousands of person

hours. The documents, moreover, would not shed light on the issues at stake in this proceeding. In addition, many of the documents cannot be publicly disclosed because they contain proprietary and commercially sensitive information. Finally, the documents could contain attorney-client, attorney work product, predecisional, and law enforcement-related communications that are subject to any one of a number of privileges, including the attorney client, deliberative process, attorney work product, and law enforcement privileges.

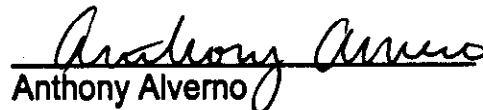
The Postal Service notes, moreover, that it has already provided the semiannual reports of the Inspector General in USPS LR-I-181 in response to interrogatory OCA/USPS-7. This should provide ample information for the OCA about the audit activities of the Office of Inspector General and the Inspection Service for purposes of this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

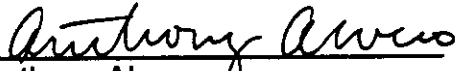
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February 18, 2000

**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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