

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

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO UPS INTERROGATORY UPS/USPS-T34-1  
TO WITNESS ROBINSON  
(February 18, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T34-1, filed on February 8, 2000. Subpart (a) of this interrogatory requests a current copy of the contract between Emery Worldwide Airlines ("Emery") and the Postal Service pursuant to which Emery provides mail processing, surface transportation, and air transportation for Priority Mail. Subpart (b) requests any other documents defining the relationship between the Postal Service and Emery regarding Priority Mail services. Subpart (c) requests the contract used in developing the proposed Priority Mail rates, if different from that requested in (a). Subpart (d) requests a description of all changes in Postal Service facility utilization, staffing, and transportation usage that resulted from the contract with Emery for Priority Mail processing, surface transportation, and air transportation, and for any documents that reflect or describe these changes.

The Postal Service objects on the ground that the information requested consists, in large part, of business, commercial, or financial information, including trade secrets, that is either privileged, confidential, or information that under good business practice would not be publicly disclosed. The Postal Service is also concerned that possible future procurement efforts involving additional Priority Mail services to be

provided by third parties could be compromised by unrestricted release of the requested information.

The Postal Service is, however, in the process of collecting and reviewing information potentially falling within the scope of this interrogatory, 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. The Postal Service notes that in Docket No. R97-1, when faced with a similar request, the Postal Service ultimately provided a redacted version of the then-current contract under strict protective conditions. In order to preserve its procedural rights at this juncture, however, the Postal Service must object to the interrogatory in full.

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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