

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 THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY ANM/USPS-T10-32(d)
(February 22, 2000)

The United States Postal Service hereby objects to interrogatory ANM/USPS-T10-32(d), filed on February 7, 2000.¹ The objection is based on relevance, and the fact that the materials in question are pre-decisional in nature and may contain facility-specific and other proprietary information.

ANM/USPS-T10-32(d) requests "all studies, analyses and similar documents produced by or for the Postal Service concerning the costs, benefits, and appropriate deployment rate of the TMS system." This is only one subpart of a multi-part interrogatory that requests other detailed information on TMS system deployment -- asking for the number of facilities that do not have a TMS system and the number of years over which deployment is to take place. Given these other inquiries, the relevance of subpart (d) is questionable. Moreover, preliminary cost-benefit analyses are not relevant. What is relevant is what has been incorporated into the filing. In addition, preliminary information that served as an input into the decision-making

^{1/} The Postal Service also objected, either in full or in part, to other ANM discovery requests contained in this set. See Objection of the United States Postal Service to Interrogatories ANM/USPS-T10-4, 7, 8 and 11 and Partial Objection to ANM/USPS-T10-10, February 7, 2000.

process is protected as pre-decisional. Also, information that identifies, for example, productivities and volumes associated with specific sites, should not be required to be revealed because of its potential to interfere with labor-management relations, as well as its potential value to postal competitors. Finally, preliminary cost-benefit information may be proprietary to the Postal Service and its contractors, and likely would be of value to competing bidders and/or competitors.

For all of the foregoing reasons, the Postal Service partially objects, in part, to this request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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