

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

RECEIVED
FEB 25 4 59 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-T34-6 AND 9
TO WITNESS ROBINSON
(February 25, 2000)

The United States Postal Service hereby objects to interrogatories UPS/USPS-T34-6 and 9, filed on February 15, 2000. These interrogatories request detailed cost attribution information pertaining to particular Postal Service advertising campaigns identified in the interrogatories. Although the Postal Service soon will be discussing these matters with counsel for UPS informally, the Postal Service wishes to preserve its objections to UPS/USPS-T34-6 and 9. Question 6 relates to statements made by the PMG regarding an advertising campaign involving Amazon.com., and the costs associated with that campaign. Information about this campaign lacks relevance, because the costs in question are FY 2000 costs, and are therefore beyond the scope of this proceeding. Moreover, the Postal Service objects to providing specific cost information about specific campaigns on the grounds that such material is commercially sensitive and should not be disclosed to competitors such as UPS. Likewise, question 9 requests information about the costs associated with a particular ad (a copy of which is attached to the question). Such information is also privileged commercial informa-

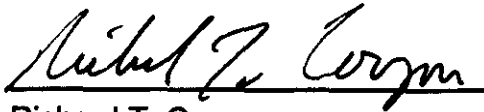
tion. As noted, however, the Postal Service will be discussing these question informally, and may be willing to file some information in response to each question.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", written over a horizontal line.

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
February 25, 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 25, 2000