

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 OCA INTERROGATORIES OCA/USPS-T13-8d AND 9
TO WITNESS RAYMOND
(February 18, 2000)**

The United States Postal Service hereby objects to interrogatories UPS/USPS-T13-8d and 9, filed on February 17, 2000. Interrogatory 8(d) requests a copy of any other data simultaneously collected as part of witness Raymond's data collection effort if the data have not already been provided. The Postal Service objects to provision of this data. The data relied upon by witnesses Raymond and Baron in support of their testimonies has already been provided in their library references. Any other information gathered for the internal purposes of the Postal Service is not within the scope of their testimony, nor directly relevant to it. Furthermore, any other information collected by the Postal Service is confidential, proprietary and commercially sensitive.

Interrogatory 9 requests the actual or estimated costs of witness Raymond's data collection efforts. The Postal Service objects to this interrogatory on the grounds of relevance. How much contractor time, internal Postal Service employee time and other

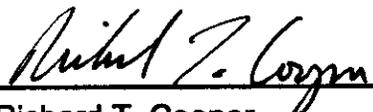
costs were expended on the data collection effort has no bearing on the base year and test year costs, revenues and rates at issue in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

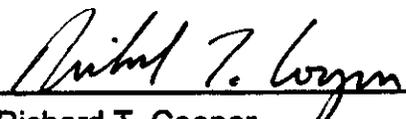
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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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.


Richard T. Cooper

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