

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-T34-11
TO WITNESS ROBINSON
(February 28, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T34-11, filed on February 16, 2000. This interrogatory requests identification of all systems maintained by the Postal Service which measure actual service performance for Priority Mail, including, specifically, the Postal Service system identified by the acronym PETE. The interrogatory also requests all manuals, guidelines, directives, or other documents which indicate how measurements are made and how the system operates, and all results for all such systems for each year (by quarter, if available) from FY 1990 through the present time.

The Postal Service objects to this interrogatory as overbroad, insofar as it requests performance information for years prior to the years at issue in this case, and insofar as it would require a burdensome review and collection of all manuals, guidelines, directives or other documents containing descriptions of the system, without limitation. The Postal Service also objects on the grounds that the information requested includes proprietary, confidential, commercially sensitive, geographically-specific performance

data which the dictates of sound business practice render inappropriate for disclosure to the public, and in particular, to competitors such as UPS.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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February 28, 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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