

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 UPS INTERROGATORY UPS/USPS-T6-10

The Postal Service hereby objects to the above interrogatory filed by UPS on February 16, 2000, and directed to Prof. Tolley. The question reads:

UPS/USPS-T6-10. Refer to page 25 of your testimony, where you discuss the Household Diary Study. Other than the Household Diary Study, has the Postal Service done, does it have, or is it aware of any studies, reports, summaries, or surveys prepared since January 1, 1995 of the usage or relative usage of the different classes of mail by households? If so, provide a copy of all such studies, reports, summaries, or surveys.

The Postal Service objects.

Question 10 constitutes a broad-based fishing expedition for commercially-valuable market research information. The Postal Service has identified responsive material, prepared by contractors who have been hired to conduct the type of market research in question. This is, however, proprietary information which has been obtained by the Postal Service only with the expenditure of substantial time, effort, and money. It should not be required to share the fruit of these efforts with its competitors. If UPS considers such information useful, it is free to hire its own contractors to conduct identical research on its own behalf. Moreover, UPS casts its net as widely as possible, requesting copies of the actual reports and studies, rather than seeking particular information.

It is important to place this interrogatory in context. As indicated in the question itself, the Postal Service already provides the Household Diary Study. Without objection, the Postal Service has also already responded to detailed interrogatories from UPS regarding household usage of specific subclasses. The information provided included information on the major subclasses with which UPS directly competes. See the responses of Dr. Tolley to UPS interrogatories 3 and 5-8, and the responses of Dr. Musgrave to UPS interrogatories 1 and 3. Any additional information along these lines would be likely to be irrelevant for ratemaking purposes, but perhaps highly useful to UPS for competitive purposes.

In conclusion, the Postal Service objects to UPS/USPS-T6-10.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

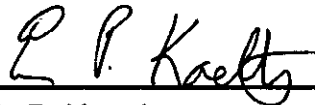
By its attorney:



Eric P. Koetting

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.



Eric P. Koetting

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