

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

**UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORY DFC/USPS-26
(February 28, 2000)**

The United States Postal Service hereby objects to interrogatory DFC/USPS-26, filed on February 11, 2000. That interrogatory requests that the Postal Service produce copies of "all Inspection Service or Office of the Inspector General audits that have been conducted on Express Mail, Priority Mail, post-office-box, certified-mail, return-receipt, or retail window service, or on stamped cards, since January 1, 1996."

The Postal Service objects to this interrogatory on grounds of relevance, burden, overbreadth, commercial sensitivity, and privilege. These requests are far too broad. Much of the auditing by the Inspection Service and the Inspector General involves operations at particular facilities, and other issues not related to issues affecting the rate case. Many hundreds of audits have been conducted by the Inspector General and the Inspection Service since January 1, 1996, and are identified only generally in an index. The burden involved in identifying which audits relate to the topics identified by Mr. Carlson, and then collecting, sorting, and copying responsive documents, would be enormous and involve perhaps 50 to 100 hours. The documents, moreover, would not shed light on the issues at stake in this proceeding. In addition, many of the documents cannot be publicly

disclosed because they contain proprietary and commercially sensitive information. Finally, the documents could contain attorney-client, attorney work product, predecisional, and law enforcement-related communications that are subject to any one of a number of privileges, including the attorney client, deliberative process, attorney work product, and law enforcement privileges.

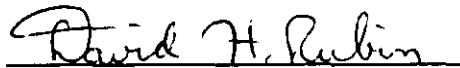
The Postal Service notes, moreover, that it has already provided the semiannual reports of the Inspector General in USPS LR-I-181 in response to interrogatory OCA/USPS-7. These reports provide an index of audits by both the *Inspector General and the Inspection Service*, and should provide ample information about the audit activities of the Office of Inspector General and the Inspection Service for purposes of this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

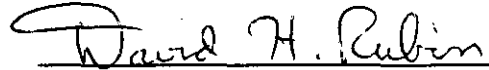
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February 28, 2000

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.


David H. Rubin

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February 28, 2000