

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

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO AAPS INTERROGATORIES AAPS/USPS-T32-2 and 3
(March 6, 2000)

The United States Postal Service hereby objects to the following interrogatories directed by Association of Alternative Postal Systems to witness Mayes: AAPS/USPS-T32-2 and 3, filed on February 23, 2000.

AAPS/USPS-T32-2

This interrogatory requests a copy of the updated Strategic Analysts Inc. (SAI) study of alternative delivery. As indicated in its separately filed objection today to AAPS/USPS-T35-9, the Postal Service has identified a 1998 revision to the SAI report in question. The report contains information which the Postal Service considers to be commercially privileged. The Postal Service incorporates herein by reference its objection to AAPS/USPS-T35-9, and invites the Commission's attention to its intention, expressed in conjunction with that objection, to file a copy of the requested report in redacted form, consistent with Presiding Officer's Ruling No. R97-1/52.

AAPS/USPS-T32-3

This interrogatory requests access to a copy of any study of private sector competition for carriage of saturation advertising material. The Postal Service has identified one document responsive to this interrogatory, but objects to its disclosure. The document, dated January 22, 1999, is an assessment of a single private delivery service conducted by SAI for the Postal Service. It consists of commercially privileged

market research concerning a single alternative delivery competitor operating in two local geographic markets and reflects the opinions and pre-decisional recommendations of SAI. Given its limited scope, it has virtually no materiality or relevance to the rate and classification proposals at issue in this proceeding. Accordingly, the Postal Service regards this interrogatory as no more than a fishing expedition for privileged, proprietary market research and objects to it on that basis. See Presiding Officer's Ruling Nos. R97-1/46, R97-1/52 and R97-1/60.

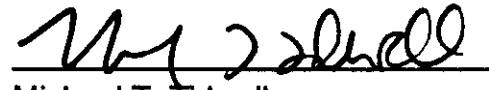
AAPS directed the same question to Postal Service witness Moeller in the form of interrogatory AAPS/USPS-T35-10 on February 23, 2000. An objection to that interrogatory was filed today. That objection is incorporated by reference herein.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

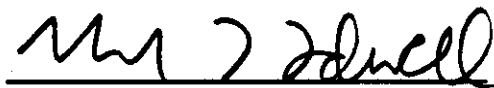


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March 6, 2000

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.



Michael T. Tidwell