

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 APMU INTERROGATORIES APMU/USPS-T34-2, 4-7, 8ac, and 14
TO WITNESS ROBINSON
(March 9, 2000)

The United States Postal Service hereby objects to interrogatories APMU/USPS-T34-2, 4-7, 8ac, and 14, filed on February 28, 2000. Interrogatory 2 asks a series for detailed questions regarding Emery's PMPC operations, such as number of planes, amount of lift capacity, use of lift capacity, and conditions under which Emery hands mail off to the Postal Service for transportation on commercial flights. Part (e) asks for the amount of any fuel surcharge contained in the contract. The Postal Service objects to these questions on the grounds of relevance. Under the PMPC contract, operational details such as these are solely the concern of the contractor, and have no bearing on the costs incurred by the Postal Service in the base year or test year. The Postal Service also objects on the ground that the answers to these questions may reveal commercially sensitive information of its contractor. Finally, to the extent that part (e) would require the disclosure of numerical price information from the PMPC contract, the Postal Service objects to part (e) on the grounds of commercial sensitivity, consistent with prior objections to provision of PMPC contract price information.

Interrogatory 4 again asks for operational information, this time concerning the capacity utilization and mode of transportation used by the contractor to transport Priority Mail between PMPCs, and times and conditions under which other types of mail

and non-mail items may be carried on the contractor's intra-regional PMPC transportation. The Postal again objects on the grounds of relevance. Under the PMPC contract, operational details such as these are solely the concern of the contractor, and have no bearing on the costs incurred by the Postal Service in the base year or test year. The Postal Service further objects on the ground that the answers to these questions may reveal commercially sensitive information of the contractor.

Interrogatory 5 is similarly objectionable. This interrogatory asks whether the contractor provided transportation by ground or by air between five specific city pairs. Not only is the mode of transportation under the PMPC contract irrelevant to Postal Service costs, but information regarding particular city pairs is irrelevant to the issues in this case. Furthermore, the Postal Service objects that responses to this question would reveal sensitive business information of the Postal Service and its contractor.

Interrogatory 6 asks for an explanation of how Priority Mail originating in specific cities is transported to a PMPC, including details of route followed, mode of transport and provider of transport. Again, the Postal Service objects that the operational and city/facility specific information sought is irrelevant to the issues in this case, and that the information sought is commercially sensitive.

Interrogatory 7 seeks an explanation of how Priority Mail that originates outside the areas served by the PMPCs and addressed to each of the five cities listed in interrogatory 6 would be transported. The Postal Service again objects that the facility/city specific information sought lacks relevance and is commercially sensitive.

The Postal Service also objects to interrogatories 8a and 8c. These questions ask for performance data on the "tail of the distribution" for First-Class and Priority Mail showing by what degree specific service standards were not met. As the Presiding Officer has ruled in prior cases, the relevance of such finely detailed performance data

is so slight as to be outweighed by potential commercial harm of disclosure, even under protective conditions.

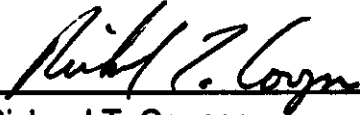
Finally, the Postal Service objects to APMU interrogatory 14. This question seeks information on the degree to which particular PMPCs are mechanized, and information regarding Emery's plans to invest in such equipment. Since the mode of operation in Emery's plants has no bearing on the Postal Service's costs under the PMPC contract, and because Emery's automation plans are commercially sensitive, the Postal Service objects to provision of the requested information.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 9, 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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March 9, 2000