

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

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T9-27 AND OCA/USPS-81)  
(March 10, 2000)

The United States Postal Service hereby objects to interrogatory OCA/USPS-T9-27, filed on February 23, 2000, and OCA/USPS-81, filed on March 6, 2000. A motion for late acceptance of the objection with respect to the former interrogatory is also being filed today. The two interrogatories seek the same thing.

Interrogatory OCA/USPS-T9-27 asks:

The following refers to the USPS FY 2000 Operating Plan.

- (a) Please provide the most current USPS FY 2000 Operating Plan by accounting periods for Postal Service operating revenues, appropriations, investment income, expenses and volumes.
- (b) For each of the thirteen accounting periods presented in part "a" of this interrogatory, please provide the most current USPS FY 2000 Operating Plan with operating revenues broken out by mail class and subclass cost categories.

Interrogatory OCA/USPS-81 asks:

Provide the Postal Service's FY 2000 budget plan in full detail (i.e., by Accounting Period and mail class and subclass).

The Postal Service objects on the grounds that some of the information sought is predecisional, is subject to change, and would be of no value or relevance with regard to this issues in this case until finalized. The Postal Service does not object to providing finalized accounting period plans; indeed it has already done so in accordance with the Commission's periodic reporting rules. Accordingly, no separate

response is required for those accounting periods since the documents are already on file with the Commission.

The Postal Service's operating budget involves the allocation of revenues, volumes, and expenses by accounting period. It also involves the establishment of budgetary targets and the allocation of resources by organizational unit. Operating budget targets involve negotiation, judgment, and the linkage to and support of operating goals. Because the operating budget process is flexible, a tactical re-allocation of resources among organizational units and programs occurs continuously to reflect changing workload, operating trends, and other priorities. As a result of this process accounting period allocations are continuously being revised within the limits of the budget's bottom line. The accounting period spreads are subject to change up until they are finalized in the Financial and Operating Statement (FOS) for each accounting period. The accounting period plans have already been made available for accounting periods 1-6 in the Financial and Operating Statements. The preliminary accounting period plans for accounting periods 7-13 are not finalized and are subject to continuous change. They will be provided when finalized and printed as the FOSs.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



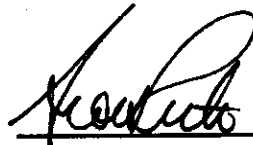
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Scott L. Reiter

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March 10, 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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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March 10, 2000