

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 INTERROGATORY DBP/USPS-7 OF DAVID B. POPKIN
(March 13, 2000)

The United States Postal Service hereby objects in part to interrogatory DBP/USPS-7, filed by David B. Popkin on March 3, 2000, on the grounds of relevance and commercial sensitivity. Interrogatory DBP/USPS-7 asks about the transfer of a few facilities from one post office box fee group to another, which occurred at the same time as the implementation of the new rates and fees from Docket No. R97-1. In particular, through this interrogatory Mr. Popkin appears to seek a better understanding of how it was determined late in 1998 to reclassify the Englewood Cliffs, New Jersey facility from fee group C to fee group B. He asks how the calculations were made for Englewood Cliffs, and the specific numbers utilized for the change.

In response, witness Kaneer will explain the process and quantitative criteria by which ZIP Codes were determined to be moved from one fee group to another. Moreover, he will describe the calculations as applied specifically to Englewood Cliffs. The Postal Service believes that this will provide Mr. Popkin with an adequate understanding of how it was determined that certain locations, including Englewood Cliffs, qualified for transfer from one fee group to another.

The Postal Service objects, however, to the extent that Mr. Popkin requires the site-specific numbers used for Englewood Cliffs. These numbers include the numbers of boxes installed and in use for that post office, as well as the annual rent and square


feet for that facility. This facility-specific information relates to a determination made more than a year ago to change the fee group for a few facilities.¹ This information is irrelevant to this docket, however, as the Postal Service is proposing a new methodology for assigning fee groups in this proceeding. This new methodology, unlike the reclassification of facilities in January, 1999, does not rely on utilization of boxes, and is based on ZIP-Code-based rent estimates provided by witness Yezer (USPS-T-31), rather than on simple division of annual rents by facility square feet. The facility-specific information that Mr. Popkin requests also is commercially sensitive, since it could help competitors determine whether to open a competing mailbox facility nearby.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

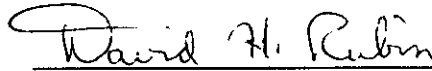
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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

475 L'Enfant Plaza West, SW
Washington, DC 20260-1137
(202) 268-2986; Fax -6187
March 13, 2000

^{1/} Given the information that witness Kaneer will provide in his response to interrogatory DBP/USPS-7, the facility-specific information is not needed to understand how Englewood Cliffs was selected for a fee group change back in late, 1998.