

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES DBP/USPS-11(b)-(m)
(March 17, 2000)

The United States Postal Service hereby objects to interrogatories DBP/USPS-11(b)-(m), filed on March 3, 2000. These interrogatories seek information which is irrelevant to any issue in this proceeding.

The questions begin by seeking to determine how many post offices are in the format of a Postal Retail Store -- a figure which, if revealed, would not provide the Commission with one iota of information material to the issue of what rates or classifications it should recommend in this proceeding. From there, the questions seek a comparison of the manner in which retail stamp purchases occur at Retail Stores vs. Post Offices. Then, the questions inquire about differences in frequency of stamp inventory audits at Retail Stores vs. Post Offices, and whether there are more inaccuracies at Retail Stores vs. Post Offices. Next, the questions seek to determine the types of personnel or disciplinary or other action taken when stamp stocks and retail transaction records fail to match at Retail Stores vs. Post Offices. None of these questions is reasonably calculated to elicit information having any bearing whatsoever on any issue in this proceeding.

Perhaps, Mr. Popkin is aware of some allegations of malfeasance on the part of some postal clerk and wants to know how the situation might be resolved by the Postal

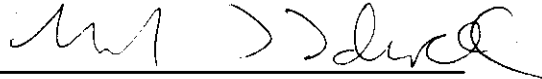
Service. Who knows? In any event, these questions, whatever they relate to, have no bearing on any issues in this proceeding and the Postal Service objects to the request that answers be provided.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

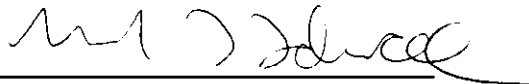


Michael T. Tidwell

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March 17, 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