

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
MAR 17 4 40 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY ABA&NAPM/USPS-T33-7
(March 17, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to interrogatory ABA&NAPM/USPS-T33-7, dated March 8, 2000. The interrogatory imposes an undue burden and requests information of no probative value in this proceeding.

Part (a) of the interrogatory requests confirmation of a specific 1975 rate change. One of the reasons the Postal Service filed Library Reference I-118 (Domestic Mail Rate History) in this proceeding on January 12, 2000, was to be relieved of the considerable burden of answering questions about the innumerable postal rates of yesteryear. The document contains the information requested and permits parties to perform their own historical rate analyses, without peppering postal witnesses with questions about what a particular rate might have been a quarter century ago, or what percentage change it represented in relation to a predecessor rate. Having made the information available to all parties in this proceeding in the form of a Library Reference, the Postal Service should not now be burdened with having to respond to interrogatories which ask it to confirm that the information in the Library Reference is what it purports to be.

Part (b) of the interrogatory also is objectionable. It requests that the Postal Service "state the annual contribution revenues from First-Class extra ounces have contributed to postal finances" – from 1975 to 1998.

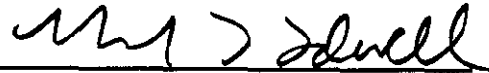
On the basis of the testimony of witness Fronk (USPS-T-33) and his Workpaper 4, the Postal Service will be able to generate responsive data relevant to the Docket No. R2000-1 test year. However, in Docket Nos. R97-1, MC95-1, and R94-1, the Postal Service either did not provide additional ounce cost data at all or did not provide data which had any degree of reliability. The Postal Service did file a Library Reference (F-177) in Docket No. R90-1, which presented data for the Docket No. R87-1 test year (FY 1989). However, those data do not permit a calculation comparable to that which the Postal Service is prepared to do on the basis of more refined Docket No. R2000-1 data, without considerable data manipulation and unless several assumptions are made. Revenue and cost data in LR F-177 are presented for pieces in total, not just for the additional ounce increment. Moreover, LR F-1777 data for weight increments are grouped together; for example, data for 7-12 ounce pieces are aggregated.

Even if the Postal Service were able to cobble together something based upon LR F-177, the result would be two points of comparison, the Docket No. R87-1 test year and the Docket No. R2000-1 test year. Putting aside the methodological differences which would diminish one's ability to compare these two data points head-to-head, these two points alone would not provide a basis for meaningful analysis of historical institutional cost contribution by First-Class Mail additional ounces. Accordingly, the Postal Service objects to being burdened with manipulating the F-177 data to present information of so little value to this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

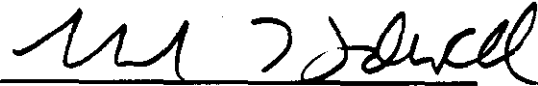


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
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