

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 CARLSON INTERROGATORY DFC/USPS-53
(March 17, 2000)

The United States Postal Service hereby objects to interrogatory DFC/USPS-53, filed on March 7, 2000. This interrogatory requests identification of ZIP-Code pairs referred to in the response to DFC/USPS-T34-13. The response stated:

I am informed that there are 649,106 valid 3-digit ZIP Code pairs. (1) There are currently 49 ZIP Code pairs where First-Class Mail provides overnight service, while Priority Mail provides two-day service. These cases appear to be data-base errors and are being resolved. (2) There are currently 151 ZIP Code pairs where Priority Mail provides overnight service, while First-Class Mail provides two-day service.

The Postal Service objects to providing this detailed information. First, the identity of the requested pairs, while of interest to Mr. Carlson, and undoubtedly of others, including the Postal Service's competitors, is nonetheless far removed from the costing and pricing matters at issue in this proceeding, and is irrelevant. The Postal Service also objects to providing this information on the grounds that the information associated

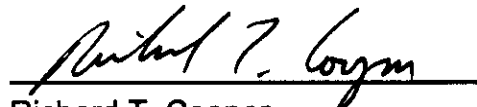
with data base errors, while in the process of being corrected, could be used by competitors to harm the commercial interests of the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.


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March 17, 2000