

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

**UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORY OCA/USPS-90**

The Postal Service hereby objects to interrogatory OCA/USPS—90, filed on March 9, 2000. Interrogatory 90 asks the Postal Service to: (i) provide estimates of the costs of conducting public voting on the "Celebrate the Century" stamp series and the Elvis stamp; (ii) state whether the Postal Service considered the positive effect of public participation in these stamp selection processes; and (iii) provide all documents related to the public relations or public service benefits of conducting the voting campaigns. The Postal Service objects to this interrogatory on grounds of relevance, commercial sensitivity, and privilege.

Some background information is in order. In 1993, the Postal Service issued a commemorative stamp honoring American rock-n-Roll performer Elvis Presley. To select the final design, in 1992, the Postal Service publicized two different designs for an Elvis Presley stamp and invited the public to vote through mail-in ballots on their preferred design. The Celebrate the Century series began in 1998 with the periodic issuance of special commemorative stamps heralding the most significant events of each decade of the 20th century in five categories: People and Events, Arts and Entertainment, Lifestyles, Sports, and Science and Technology. The Postal Service selected the designs for stamp sheets

commemorating events in the first half of the century, *i.e.*, the 1900s to the 1940s, and during the period from February 1998 to June 1999, while stamp sheets commemorating the first half of the decade were issued, the public was invited to vote through mail-in ballots on stamp subjects for the latter part of the century, *i.e.*, the 1950s to the 1990s. Voting began in February 1998 with the 1950s and concluded in April 1999 with the 1990s. The program is still active; stamp sheets for the 1980s were issued in January 2000 and stamps for the 1990s are scheduled to be issued later this spring.

Costs, analysis of public participation, and public relations benefits associated with these stamp programs are irrelevant. The requested information is well beyond the scope of this proceeding. The costs for the Elvis stamp predate the base year by approximately 6 years, while voting costs for the Celebrate the Century series span beyond the close of the base year. Moreover, the requested information has nothing to do with the rate and classification proposals at issue in this proceeding.

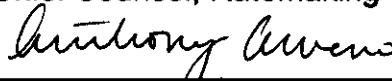
The Postal Service also objects to providing disaggregated, stamp-specific project costs about these stamps programs, as well as any analyses of the public relations value and public participation effects of these programs, on grounds of commercial sensitivity. There are numerous entities, both public and private, that are engaged in the design and marketing of stamps for countries throughout the world. Such entities could readily profit from cost and other information about these programs. Such information is proprietary and valuable, and should not be disclosed.

Finally, although the Postal Service has identified no privileged documents related to this interrogatory, to preserve its rights in the event that further searches uncover documents subject to any privilege, the Postal Service raises this additional objection to disclosure. For example, it is conceivable that, given the nature of the program and the questions posed, some documents containing predecisional deliberations could be responsive to this interrogatory, and such documents would be protected by the deliberative process privilege.

UNITED STATES POSTAL SERVICE

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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 23, 2000