

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 PARTIAL OBJECTION
TO INTERROGATORY DFC/USPS-T30-22
(March 23, 2000)

The United States Postal Service hereby objects in part to interrogatory DFC/USPS-T30-22, filed on March 13, 2000 by Douglas F. Carlson. That interrogatory asks witness Davis for the city and ZIP Code of each facility for which he provided raw data in response to DFC/USPS-T30-12(a).¹ The Postal Service objects to identifying these locations, on grounds of relevance and protection of facility-specific data. The identification of these facilities is not necessary to evaluate witness Davis' cost study. Mr. Carlson has asked a wide variety of questions about witness Davis' data and study design in interrogatories DFC/USPS-T30-21 through 64, without need for the facility identification.

Moreover, in his letter to the postmasters asked to participate in the study, Chief Operating Officer Clarence Lewis stated that:

Your support is very important to the success of this survey. The data gathered will not be used to evaluate you or any of your

¹ The interrogatory also asks for the CAG level, number of city and rural carrier routes that the facility serves, and post office delivery statistics. The Postal Service does not object to providing this information, as long as the facilities are not identified by city or ZIP Code.

personnel; additionally, the data will not be provided to any party except with the facility identifiers removed.

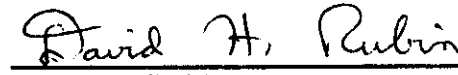
While this interrogatory does not ask for any other study data, Mr. Carlson was provided those data in response to DFC/USPS-T30-12(a). In conjunction with all the questions Mr. Carlson is asking about the data, the risk that the data will be linked to facility identifiers is high. Withholding the facility identifiers is the best way to allow an open evaluation of witness Davis' study, and avoid the need for later objections that answering a particular question would provide a link to the facility identifiers. If postmasters become concerned that data they provide for rate case cost studies will not be protected, then the ability to obtain accurate data from the field will be compromised.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

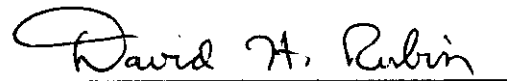
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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

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March 23, 2000