

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

RECEIVED

MAR 27 4 52 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO UNITED PARCEL
SERVICE INTERROGATORY TO WITNESS MEEHAN (UPS/USPS-T11-19)
(March 27, 2000)

The United States Postal Service hereby objects to United Parcel Service interrogatory UPS/USPS-T11-19 directed to witness Meehan on March 17, 2000. The grounds for the objection are relevance, commercial sensitivity and mootness.

The interrogatory states:

USP/USPS-T11-19. Refer to the Postal Bulletin 22019 (3-9-00), page 12 attached hereto. Provide a copy of the Postal Service's "Finance Handbook," Edition Date 1/00, Document ID HBK F-85.

The cited Postal Bulletin notice contained several errors. First, the accurate title of Handbook F-85 is "Data Collection User's Guide for International Revenue, Volume, and Performance Measurement Systems." Second, the edition date indicated (1/00) does not reflect actual publication of the document. In actuality, the F-85 handbook is currently still being prepared for internal distribution, although it exists in draft form. The Postal Service did provide a copy of the draft to the Commission in connection with the Commission's new Rule 103, and the upcoming report to Congress on international mail for FY 1999 (see Order No. 1285). The Postal Service, however, requested that the Commission not disclose it to the public initially, pending identification by the Postal Service of limited parts of the handbook, which contain sensitive commercial information. The Postal Service expects to be able to identify those parts shortly. Once

the handbook is no longer a draft, it can be made available with confidential parts deleted.

Pending resolution of the handbook's status, the Postal Service objects to the interrogatory. First, the F-85 is irrelevant to the instant proceeding, which pertains to domestic, not international rates. Second, as noted, the handbook contains pages that display commercially sensitive data and information pertaining to international mail. It is, therefore, privileged and confidential. Third, as it currently exists, the handbook still has a preliminary, draft status, and is protected by the government documents privilege. Finally, we emphasize that, at least with respect to the parts of the handbook that are not commercially sensitive, the matter is likely to be substantially moot in the near future, since most of the handbook in redacted form will likely be made available, once the sensitive parts have been deleted.

For all of the foregoing reasons, the Postal Service should not have to respond to UPS/USPS-T11-19.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
202) 268-2990 Fax -5402
March 27, 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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
202) 268-2990 Fax -5402
March 27, 2000