

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 THE UNITED STATES POSTAL SERVICE  
TO ABA&NAPM INTERROGATORY T32-1(d)  
(March 27, 2000)

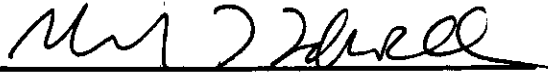
In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objection to interrogatory ABA&NAPM/USPS-T-321(d), dated March 17, 2000.

The objectionable subpart (d) follows three unobjectionable subparts which essentially ask witness Mayes to confirm that the wording of 39 U.S.C. § 3622(b)(6) either (a) "does not exclude", or (b) explicitly "refers to", or (c) "does not specify" a specific matter. On the other hand, subpart (d) asks her to confirm that § 3622(b)(6) "does not limit the cost reductions from mailer preparation to attributable costs or volume variable costs." The Postal Service considers this question to be materially different from the others. The question appears to go beyond asking how the Postal Service or the Commission have applied the statute ask whether § 3622(b)(6) allows for consideration of cost reductions from mailer preparation which are not volume variable or attributable costs. The answer to such a question calls for a legal conclusion. Accordingly, the Postal Service considers it objectionable.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



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February 4, 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