

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 UPS INTERROGATORIES UPS/USPS-T34-28 and 29b
TO WITNESS ROBINSON
(March 29, 2000)

The United States Postal Service hereby objects to interrogatories UPS/USPS-T34-28 and 29(b), filed on March 17, 2000. Interrogatory 28 requests, for each quarter in BY 1998 and FY1999, "copies of the Service Performance Quarterly Reports for First-Class Mail based on the EXFC service performance measurement system." Interrogatory 29(b) requests for each quarter in BY 1998 and FY1999, "copies of the Service Performance Quarterly Reports or the equivalent for Priority Mail based on . . . the PETE service performance measurement system." The Postal Service objects to provision of these reports on the ground that the reports which the Postal Service has identified as potentially responsive to these interrogatories contain confidential, commercially sensitive and geographically-specific performance information that is irrelevant to this proceeding and, if disclosed to a competitor such as UPS, could impair legitimate business interests of the Postal Service. Specifically, the reports contain information regarding specific, localized area that could be used by competitors to the disadvantage of the Postal Service, while serving no purpose in this proceeding which does not involve separate rates for those areas. In addition, the performance information contained in the reports is beyond the detail needed for this proceeding. For its purposes, the Commission need not know by how many days a certain proportion of a particular class of mail fails to meet a delivery standard.

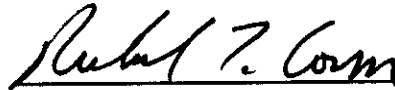
Moreover, the Postal Service has already provided national aggregate performance information for both First-Class Mail and Priority Mail which is sufficient for the purposes of this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", written over a horizontal line.

Richard T. Cooper

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March 29, 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.


Richard T. Cooper

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March 29, 2000