

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

RECEIVED  
MAR 29 4 22 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES OCA/USPS-T39-10 AND 12  
TO WITNESS MAYO  
(March 29, 2000)

The United States Postal Service hereby objects, in part, to OCA interrogatories OCA/USPS-T39-10 and 12, filed on March 16, 2000, and directed to witness Mayo.

Interrogatory 10 seeks information regarding advertising expenses related to Money Orders. The question will be redirected to the Postal Service, and an answer will be filed which provides much of the information requested. The question, however, apparently misapprehends to some extent the nature of the advertising in question. There was no single, unified, advertising "campaign" for Money Orders. The Postal Service will nonetheless endeavor to provide some examples of copies of relevant advertisements. The Postal Service objects, however, to providing detailed information regarding how its product specific advertising expenses are broken down by media, or similar quantitative or qualitative information that could be of potential use to its commercial competitors.

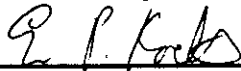
Interrogatories OCA/USPS-T39-12 asks the Postal Service whether it conducted any research on or surveys of competitors in the money order business or of alternatives to the use of postal money orders, and, if so, to provide all documents relating to the research or studies. The Postal Service will respond that it has conducted such research. However, the Postal Service objects to providing documents relating to the research on grounds of commercial sensitivity and relevance to issues in

this proceeding. The Postal Service did not rely on any market research concerning competitors or alternatives in developing its money order proposals in this proceeding. The research has been for internal Postal Service use only, and knowledge of the types of research the Postal Service has initiated could reveal information on its future plans and strategies, and could thereby jeopardize the Postal Service's ability to compete as effectively in the money order market. Moreover, secondary research of this type, which is essentially a literature search, could just as easily be conducted by the OCA itself, or any other interested individual or organization. The Postal Service has spent its own time and money acquiring this information, and there is no reason why it should be compelled to make that information public and allow potential competitors (or potential adversaries in litigation) to obtain the results at no cost to themselves.

Respectfully submitted,

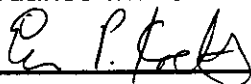
UNITED STATES POSTAL SERVICE

By its attorney:

  
\_\_\_\_\_  
Eric P. Koetting

**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.

  
\_\_\_\_\_  
Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992 Fax -5402  
March 29, 2000