

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

RECEIVED
MAR 30 4 40 PM '00
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 INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-69)

(March 30, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects, in whole or in part, to interrogatory DFC/USPS-69 filed by Mr. Carlson on March 20, 2000, and directed to the Postal Service.

Interrogatory DFC/USPS-69 is a follow up question to a previous interrogatory from Mr. Carlson regarding performance clusters. See DFC/USPS-47. The Postal Service responded to Mr. Carlson's general questions on performance clusters. However, the level of detail addressed in this interrogatory is beyond anything that would be useful in helping to evaluate the pricing criteria of the Act. The operational details of a service are beyond the scope of material issues in a rate proceeding and contribute little to the record in this case.

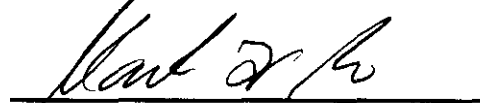
The above-referenced interrogatory is not within the bounds of appropriate discovery. The information sought is of little relevance and is not reasonably calculated to lead to the production of admissible evidence, and responding to it would impose an undue burden on the Postal Service. Therefore, the Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Mark W. Ro

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.



Mark W. Ro

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3231; Fax -5402
March 21, 2000