

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 INTERROGATORY OF KEYSpan (KE/USPS-T33-3(g))  
(March 31, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects to interrogatories KE/USPS-T33-3(g) and (h), filed by KeySpan on March 23, 2000.

Subpart (g) of T33-3 asks the Postal Service to state whether it agrees that the Governors' approval of the Commission's recommended accounting fee for Qualified Business Reply Mail (QBRM) in Docket No. R97-1 "effectively accepts a QBRM per piece fee that did not reflect 287 million lower-cost BRMAS BRM pieces in the derivation of the unit cost to process QBRM letters." Subpart (h) asks whether the current QBRM accounting fee is based on a cost analysis that overstates unit costs.

These questions follow subparts (d) and (e), which generally ask for confirmation that the Governors' Docket No. R97-1 decision does not modify the Commission's Qualified Business Reply Mail (QBRM) accounting fee cost analysis or the fee recommendation.

All four of these questions seek information outside the scope of the current proceeding. The purpose of Docket No. R2000-1 is to review the Postal Service's Docket No. R2000-1 request, not to conduct a *post mortem* examination of the Governors' Docket No. R97-1 decision. That decision speaks for itself.<sup>1</sup> The substance

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<sup>1/</sup> To minimize motions practice, the Postal Service waives its objections to subparts (d) and (e), which ask for confirmation that the Governors' decision (says what it says and) does not modify the Commission's opinion concerning the QBRM accounting fee.

of that decision has been subjected to judicial review under applicable legal standards. It is now moot whether the Governors took into account this or that in reaching their various determinations. At issue before the Commission now is whether the cost estimates underlying the Postal Service's Docket No. R2000-1 QBRM accounting fee proposals are understated, overstated, or on the mark.


An inquiry such as T33-3(g), which seeks to look behind the Governors' Docket No. R97-1 decision and to dissect the relationship between their rejection of PRM and their approval of QBRM is not calculated to lead to the production of admissible evidence relevant to the subject matter of Docket No. R2000-1, the focus of which is the request currently before the Commission. Subpart (h) is equally objectionable, because it is immaterial to the question of the propriety of QBRM accounting cost estimates in Docket No. R2000-1 whether the Commission or the Governors "understated" or "overstated" QBRM accounting costs in Docket No. R97-1. The Docket No. R2000-1 QBRM accounting cost estimates are on the table as the appropriate topic for review.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

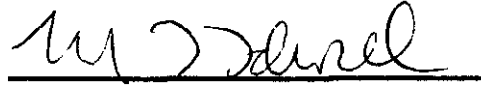


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March 31, 2000

**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.

A handwritten signature in cursive script, appearing to read "M. Tidwell", is written over a horizontal line.

Michael T. Tidwell

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