

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 INTERROGATORIES
OF MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-17(d) (IN PART), 19 (IN PART) AND 40(c))
(March 31, 2000)

The United States Postal Service hereby objects to Magazine Publishers of America, Inc. interrogatories MPA/USPS-17(d) (in part), 19 (in part) and 40(c). The information requested is irrelevant, commercially sensitive, or both.

MPA/USPS-17(d) states:

Please describe and provide documentation of the following:

projections of the impact of USPS market and operating changes on transportation requirements during any portion of the period 1994-2002.

Information for 2002 is not relevant to this case. The Test Year is 2001; anything beyond that has no bearing on the issues. Furthermore, projections for years beyond the TY 2001 may well be commercially sensitive. Competitors should not have access to future Postal Service plans for moving the mail which could reveal volume or market share projections, or which might contain sensitive O-D pair routing information. To the extent, however, that the Postal Service even has information responsive to this interrogatory for 2002 which is not commercially sensitive, it will be provided.

MPA/USPS-19 states:

Please provide a copy of the contract(s) under which the Postal Service procures mail-related transportation from Amtrak.

Although the Postal Service has not yet reviewed the contract, it is likely to contain information that is considered commercially sensitive to the Postal Service and to Amtrak. Thus, the Postal Service will furnish a redacted copy of the contract in response to the interrogatory.

MPA/USPS-40(c) states:

For each freight railroad providing mail-related transportation to the Postal Service in BY98, please provide the following:

the number of mail-related movements, total costs, base rates and lowest achieved volume incentive rates by O-D pair served in BY98.

To the extent such information even exists at such a level of disaggregation, its relevance is not clear.¹ The cost pools speak for themselves. Movements, costs and rates by individual freight railroad by O-D pair add nothing of substance to the record of this proceeding. Moreover, mail movements, costs and rates by O-D pair are commercially sensitive. Both competitors and potential postal transportation providers could make use of this information to the obvious detriment of the Postal Service. In addition, the railroads themselves may consider the base and any volume incentive rates they offer to a particular customer to be commercially sensitive information that they do not wish to reveal to their other customers or competitors.

^{1/} If such information does not exist, the Postal Service will provide a response to MPA/USPS-40(c) so indicating.

As described above, the Postal Service objects to providing answers to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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