

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

**UNITED STATES POSTAL SERVICE OBJECTION
TO DOUGLAS F. CARLSON INTERROGATORY
DFC/USPS—77(C), (D), AND (F)**

The Postal Service hereby objects to interrogatory DFC/USPS—77(c), (d), and (f), filed on March 23, 2000. Subpart (c) requests confirmation that artistic design, in lieu of alphabetical designation, will be used to determine the postage value of basic-rate stamps issued for Docket No. R2000-1. Subpart (d) requests that the Postal Service discuss studies or other information on customer confusion related to the use of artistic designs, in lieu of alphabetical or numerical designations, for determination of the postage value of postage stamps. Subpart (f) asks if the Postal Service will have sufficient lead time to print stamps with the new, presumably numerical, rates on them.

The Postal Service objects to subparts (c), (d), and (f) on grounds of relevance. The information sought in these subparts is plainly immaterial to the issues before the Commission. Postal rate proceedings are not press conferences. While information about the selection of numerical and alphabetical denominations on stamps, as well as any plans to use nondenominated stamps, may be of interest to the philatelic press and hobbyists, it simply has no bearing on the Commission's evaluation of the classification and pricing criteria of 39 U.S.C. §§ 3622 and 3623. Such implementation-related matters are, moreover, reserved exclusively for

postal management and are clearly beyond the scope of permissible discovery. Cf. PRC Order No. 1254 (holding that complaint on alteration of ZIP Code boundaries is "clearly an operational matter within the exclusive jurisdiction of Postal Service management, in compliance with the policies set forth in Title 39.").

In addition, the Postal Service objects to subpart (d) on grounds of deliberative process privilege to the extent it requires a discussion of the Postal Service's predecisional impressions regarding customer behavior.¹

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

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.



Anthony Alverno

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March 31, 2000

¹ By objecting, the Postal Service does not wish to convey the impression that it has conducted any formal market research or prepared a written analysis in this regard.