

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

RECEIVED

APR 3 4 46 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY DFC/USPS-T39-56 OF DOUGLAS F. CARLSON
(April 3, 2000)

The United States Postal Service hereby objects to interrogatory DFC/USPS-T39-56, filed by Douglas F. Carlson on March 23, 2000, and directed to witness Mayo. Interrogatory DFC/USPS-T39-56 requests, for all changes in special services that the Postal Service proposed in Docket No. MC96-3, the nature of the interest in those changes that witness Mayo heard from postal customers prior to filing Docket No. MC96-3. The interrogatory also asks how many communications of interest were received for each change.

The Postal Service objects on the basis of lateness, relevance, and burden because the questions concern a docket that was filed nearly 4 years ago, and completed over 3 years ago. Mr. Carlson participated in that docket, and had a full opportunity to conduct written and oral cross examination of witness Mayo's proposals in that docket, including questions on expressions of interest by postal customers. It is too late for such questions now (even if Mr. Carlson could show some relevance to this docket). Recollections of several years ago, especially for a witness who has participated in several proceedings since, likely will be too vague to be helpful to the record in this proceeding. Identifying any responsive information that might exist, and

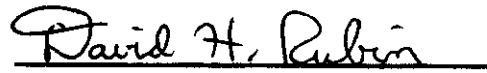
compiling it, would impose an undue burden given the lack of relevance to this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

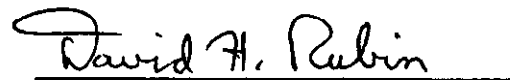
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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.



David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; FAX -6187
April 3, 2000