

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

**UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORY NAA/USPS-1(A) AND (D)**

The Postal Service hereby objects to interrogatory NAA/USPS-1(a) and (d), filed on March 23, 2000. Subpart (a) asks whether the Postal Service still uses the 1998 Marketing Plans, prepared in October 1997. Subpart (d) asks whether the Postal Service has produced a more recent marketing plan comparable to the one prepared in October 1997. The Postal Service objects on grounds of relevance, commercial sensitivity, and privilege.

Discovery related to the 1998 marketing plan, as well as any existing marketing plans, is well beyond the scope of this proceeding. Whether the Postal Service still makes any use of historical marketing plans does nothing to inform the rate and classification proposals currently before the Commission. Further, whether the Postal Service has created more recent marketing plans is of no concern to the participants in this proceeding. Such inquiries are nothing more than fishing expeditions designed to assess the Postal Service's strategic planning and competitive capabilities.

Further, to preserve its rights with respect to any follow-up and related discovery, the Postal Service objects to these subparts on grounds of commercial sensitivity and deliberative process privilege. By their nature, marketing plans contain sensitive commercial information and predecisional

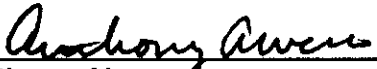
plans. Disclosure of such information would seriously impair the Postal Service's ability to compete effectively and chill agency subordinates' ability to candidly express opinions and recommendations.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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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April 3, 2000