

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 DOUGLAS F. CARLSON  
(DPB/USPS -71-73, and 75)  
(April 3, 2000)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects, in whole or in part, to interrogatories DFC/USPS-71-73, and 75, filed by Mr. Carlson on March 23, 2000, and directed to the Postal Service.

Interrogatory DFC/USPS-71 asks the Postal Service to discuss the extent to which every post office delivers mail six days per week, at one or more of the facilities under its jurisdiction. The Postal Service objects to this question as being irrelevant and burdensome. Furthermore, a similar question has been previously asked and answered. See Response of United States Postal Service to DBP/USPS-14(a-c), and to DFC/USPS-23(b-d).

The Postal Service objects to interrogatory DFC/USPS-72 on the grounds of materiality and relevance. This interrogatory requests the Postal Service to provide all policies that explain and govern the Postal Service's obligation, if any to provide every American mail delivery six days per week. Mr. Carlson can identify these policies himself by doing his own legal research, and the Postal Service should not be required to do it for him. Moreover, any nexus between his request and the issues in this proceeding is not apparent.

The Postal Service objects to DFC/USPS-73 regarding conflicts between the

DMM and POM. The Postal Service believes that its response to the question, posed entirely in the abstract, would not have any relevance to ratemaking.

The Postal Service objects to DFC/USPS-75, which requests the Postal Service to explain a chapter of the POM, concerning Sunday collections. This interrogatory concerns operational information that is not reasonably calculated to lead to the production of admissible evidence, nor is it relevant to the issues of this ratemaking proceeding. Even were the question relevant, no responsive information could be provided beyond that already presented in response to DBP/USPS-76.

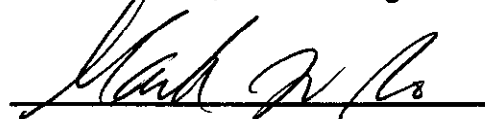
The above-referenced interrogatories are not within the bounds of appropriate discovery. The information sought is of little relevance and is not reasonably calculated to lead to the production of admissible evidence, and responding to them would impose an undue burden on the Postal Service. Therefore, the Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

A handwritten signature in black ink, appearing to read "Mark W. Ro", is written over a horizontal line.

Mark W. Ro

## 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.

  
Mark W. Ro

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2321; Fax -5402  
April 3, 2000