

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 OF UNITED PARCEL SERVICE DIRECTED TO
WITNESS BARON
(UPS/USPS-T12—11)
(April 6, 2000)**

The Postal Service hereby objects to interrogatory UPS/USPS-T12—11, filed on March 23, 2000. The interrogatory requests that witness Baron furnish electronic versions of two files, ALDRAN.FOS.STS.SAS.DATA (hereinafter "SAS Program") and ALDRAN.HQ059TOI .CITY.PQ4FY97 (hereinafter "City Frame File") referenced in USPS LR-I-159. The Postal Service objects to the production the City Frame File in unredacted form on grounds of commercial sensitivity.

The City Frame File contains specific information on the number of deliveries, by type, for every city carrier route for post office and ZIP Code combinations in the country.¹ Such information in the hands of competitor would reveal the concentration of delivery points in any given locality, thereby indicating the areas that are likely to be most profitable to alternative delivery firms engaged in the distribution of advertising matter and merchandise samples, as

¹ In particular, the file contains route records, which include for each delivery route the following: finance number, post office name, ZIP Code of route, route number, delivery mode of the route (foot, P&L, etc.), residential curb deliveries, residential centralized deliveries, residential neighborhood delivery and collection box units (NDCBU) deliveries, residential other deliveries, business curb deliveries, business centralized deliveries, business NDCBU deliveries, business other deliveries, drop count deliveries (deliveries where carrier "drops" mail for a group of deliveries at one point), and unique ZIP Code indicators.

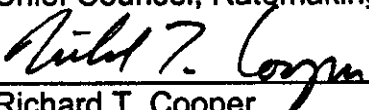
well as to private carriers engaged in the delivery of parcels. Thus, to the extent UPS requests the information without redactions for post office, finance number, and ZIP Code variables, the Postal Service objects to providing the requested file. The Postal Service is prepared, however, to undertake to redact these variables and provide a redacted version of the file.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper
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.


Richard T. Cooper

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April 6, 2000