

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 UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORY UPS/USPS-T34-34
TO WITNESS ROBINSON
(April 7, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T34-34, filed on March 22, 2000. Interrogatory 34 requests, for each quarter in BY 1998 and FY1999, "copies of any Priority Mail service performance reports (similar to Quarterly Statistics Reports from the Origin-Destination Information System) based on Delivery Confirmation data." The Postal Service objects to provision of these reports on the ground that the reports which the Postal Service has identified as potentially responsive to these interrogatories contain confidential, commercially sensitive and geographically-specific performance information that is irrelevant to this proceeding and, if disclosed to a competitor such as UPS, could impair legitimate business interests of the Postal Service. Specifically, the reports contain information regarding specific, localized areas that could be used by competitors to the disadvantage of the Postal Service, while serving no purpose in this proceeding which does not involve separate rates for those areas. In addition, the performance information contained in the reports is beyond the detail needed for this proceeding. For its purposes, the Commission need not know detailed geographic performance data. Moreover, the Postal Service has already provided national aggregate performance information for

both First-Class Mail and Priority Mail which is sufficient for the purposes of this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 7, 2000

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.


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April 7, 2000