

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
APMU TO WITNESS KINGSLEY
(APMU/USPS-T10-2)

The United States Postal Service hereby objects to the following interrogatories of APMU: APMU/USPS-T10-2, filed on March 31, 2000, and directed to witness Kingsley.

APMU/USPS-T10-2 is a follow-up to the APMU/USPS-T10-1(d), which asked about the effect of the PMPC network on classes of mail *other than Priority*. The response of witness Kingsley was that *no effect on the service performance of other classes of mail has been discernible*. To put her response in context, the witness began by noting her understanding that the PMPC network has improved service for Priority Mail, but then *immediately proceeded to a discussion of other classes*, ultimately reaching the conclusion summarized. Her comment about Priority Mail service performance was completely incidental, in the sense that the substance of her answer would not change whether that comment were included or omitted.¹

APMU now tries to bootstrap one phrase from one sentence of witness Kingsley's response to its earlier question into a full blown inquiry into the effect of the PMPC on service performance for Priority Mail by filing APMU/USPS-T10-2. The question seeks clarification of this incidental portion of her response, all evidence

^{1/} In other words, the substance of her response to 1d would have been the same if the second sentence began "Whether there have" rather than "Though there has."

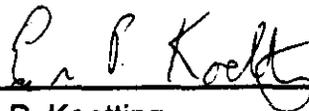
supporting it, service data for the PMPC network pieces and non-PMPC pieces, and the relation of her statement to an OIG report. The Postal Service objects to these questions as well beyond the scope of the testimony of witness Kingsley. In fact, APMU has previously sought exactly the same type of information from other witnesses, and whether that information needs to be provided will be resolved, as it should be, in other contexts. (The interrogatories in question were APMU/USPS-T34-33 - 37 to witness Robinson, to which the Postal Service objected on March 17th). The incidental comment in the response of witness Kingsley to AMPU interrogatory 1d upon which APMU now wishes to focus , however, should have no bearing on the matter.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

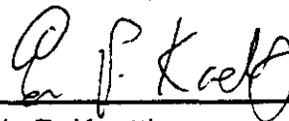
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

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.



Eric P. Koetting

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April 10, 2000