

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

RESPONSE OF UNITED STATES POSTAL SERVICE TO MOTION OF UNITED
PARCEL SERVICE TO COMPEL PRODUCTION OF INFORMATION AND
DOCUMENTS REQUESTED IN INTERROGATORIES UPS/USPS-T10-24 AND 32 TO
WITNESS KINGSLEY
(April 20, 2000)

The United States Postal Service hereby responds to the Motion of United Parcel Service to Compel Production of Information and Documents Requested in interrogatories UPS/USPS-T10-24 and 32 to Witness Kingsley, filed on April 11, 2000.

The Postal Service is not responding to the substance of United Parcel Service's motion, although this lack of response does not indicate that the Postal Service is in agreement with any of UPS' factual allegations or legal arguments. It also does not indicate that the Postal Service is abandoning or waiving any of its objections to production of the requested information. Nonetheless, the Postal Service notes that as indicated by UPS' motion to compel, it has narrowed its discovery requests. Accordingly, counsel for UPS and counsel for the Postal Service have been working together to resolve this dispute.

The Postal Service recently came into possession of the PS Forms 8125 and mailing statements that apparently formed at least part of the basis for conclusions in the OIG audit in question and that were able to be located by OIG staff. The Postal Service plans to turn over these forms to UPS after appropriate redactions have been

made, including (1) auditor markings or notes, (2) postal facility and employee information (such as facility and employee names, locations, and phone numbers), and (3) mailer information (such as mailer and mailer employee names, locations, phone numbers, permit numbers, publications names, etc.) The Postal Service also plans to prepare, to the extent it is able to do so, an index listing the particular discrepancies linked with particular forms.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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