

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T34-10(e))  
(April 21, 2000)

The United States Postal Service files this partial objection to the following interrogatory of United Parcel Service, dated April 10, 2000: UPS/USPS-T34-10(e).

The interrogatory, in part, requests that the Postal Service provide PETE data for FY 1997 through 1999, which would reveal the on-time service performance for Priority Mail with an overnight commitment and with a 2-day commitment, broken down "by originating and destinating Zip Code."

It is the policy of the Postal Service not to publicly disclose disaggregated service performance data which would reveal on-time scores between pairs of Zip Codes or other administrative subcomponents of the postal system. The Postal Service regards such disaggregated data as commercially sensitive and privileged. Such data are at the very core of the competitive commercial interests of the Postal Service. Their disclosure is unnecessary to the Commission's task of assessing the value of the Priority Mail subclass, as a whole, within the meaning of 39 U.S.C. § 3622(b)(2). Disclosure of these data to the public, and hence, to postal competitors, would permit those competitors access to extremely valuable information with which to target their marketing efforts to capture volume from the Postal Service. These data are of a type so commercially sensitive that similar data maintained by postal competitors are not publicly disclosed.

Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 21, 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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