

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

NOTICE OF UNITED STATES POSTAL SERVICE REGARDING RESPONSE TO
MOTION OF NATIONAL NEWSPAPER ASSOCIATION TO COMPEL RESPONSES
TO INTERROGATORIES NNA/USPS-T5-36, 39
(April 25, 2000)

On March 23, 2000 National Newspaper Association (NNA) filed interrogatories to Postal Service witness Hunter (USPS-T-5), including those enumerated 36 and 39 to which the Postal Service objected partially on April 3, 2000, and responded partially on April 6 while promising that additional information would be forthcoming.¹ The body of that objection indicated that the Postal Service was filing it to protect its rights since it had yet to have sufficient time to investigate the extent to which responsive materials to these interrogatories -- which did not focus upon the content of USPS-T-5 -- were available. The interrogatories asked about materials running back into the mid-1980s.

Following NNA's April 6 motion to compel responses, the Postal Service requested, without opposition by NNA, that it be afforded to today to respond to the motion to compel in the hope that counsel could work out a set of reasonable responses based upon what turned out to be available. Presiding Officer's Ruling R2000-1/42 granted this request.

The Postal Service has determined that responses to NNA/USPS-T5-36 and 39 can be provided to the extent possible. Accordingly, it withdraws its objection. The

^{1/} Witness Hunter's responses to two other interrogatories in that set, numbers 34 and 35, also indicated that additional information would be forthcoming. Additional responses to 34, 35, 36, and 39 will be provided this week.

expected burden of searching for and analyzing data from earlier years has dematerialized because responsive information was not been retained or did not exist.

The undersigned counsel attempted to contact counsel for NNA to discuss the findings reported above, without success. Given that the Postal Service will provide responses to the interrogatories, filing a notice to this effect seemed prudent. Supplemental responses to NNA/USPS-T5-34, 35, 36, and 39 will be filed in the next few days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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.



Kenneth N. Hollies

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April 25, 2000