

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 INTERROGATORY OF  
UNITED PARCEL SERVICE, UPS/USPS-T4-15  
(April 27, 2000)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T4-15, filed on April 11, 2000 on grounds of not being proper follow-up, untimeliness, lack of relevance or in the alternative prematurity, and burden.

Interrogatory **UPS/USPS-T4-15** seeks confirmation of certain details of Parcel Post revenue and volume reported in the 1999 Cost and Revenue Analysis (CRA) and then seeks calculation of Parcel Post revenue and volume using another method. The Postal Service objects on five grounds. The interrogatory is not follow-up to an interrogatory response provided by the Postal Service and it is filed after the end of discovery on the Postal Service direct case that occurred on March 23, 2000. Moreover, it is not relevant to the base year on which the Postal Service direct case is based, and is accordingly irrelevant to proposals contained therein. In Notice of Inquiry No. 2, the Commission has requested input from participants by May 8 regarding how, if at all, FY 1999 data should be used in this proceeding; hence, to the extent UPS/USPS-T4-15 may prove to have relevance, it has yet to be established. At the least, depending upon what the Commission does after receiving comments and replies to comments in connection with NOI-2, UPS/USPS-T4-15 is premature. Finally, the Postal Service objects on grounds of undue burden. Were the Postal Service to undertake development of an answer today, it could not be completed until


approximately May 12, 2000 since an affirmative response would essentially require deconstruction and reconstruction of and then a complete re-running of the RPW model. The May 12 date is also based upon the fact that the individuals who would need to perform the work also have other work to perform that is driven by the necessity of conducting an ongoing business. Wherefore, the Postal Service objects to this interrogatory on grounds of being improper follow-up, untimely, irrelevant and/or premature, and burdensomeness.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

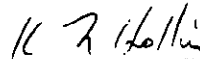


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Kenneth N. Hollies

### 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.



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Kenneth N. Hollies

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April 27, 2000