

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  
VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-PAK DEALERS'  
ASSOCIATION, INC., AND CAROL WRIGHT PROMOTIONS, INC. (VP-CW/USPS—1)**

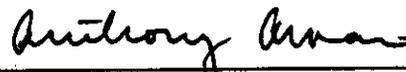
On April 25, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions filed interrogatory VP-CW/USPS—1. The interrogatory is not styled as follow-up discovery, and as it filed prior to the receipt of other participants' cases-in-chief, it cannot possibly be intended for the purpose of the preparation of rebuttal to other participants' cases in chief. Cf. P.O. Ruling No. R97-1/85 at 4. The Postal Service accordingly objects to this interrogatory on grounds that it is untimely filed under the procedural schedule in P.O. Ruling No. R2000-1/4 and under Rule 25(a) of the Commission's Rules of Practice and Procedure. Nevertheless, in the spirit of cooperation, the Postal Service intends to provide a response to this interrogatory. By filing a response, however, the Postal Service does not intend to waive its right to object to follow-up or related discovery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

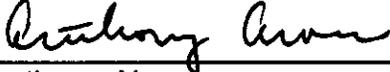
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Anthony Alverno  
Attorney

## 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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Anthony Alverno

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May 4, 2000