

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  
NATIONAL NEWSPAPER ASSOCIATION, NNA/USPS-15  
(May 8, 2000)

The United States Postal Service hereby objects to interrogatory NNA/USPS-15, filed on April 21, 2000, on the grounds that it is not proper follow-up and that it is otherwise untimely.

Interrogatory NNA/USPS-15 points to the testimony of witnesses Thress (USPS-T-6) and Tolley (USPS-T-7) and to the response to NNA/USPS-4, filed March 8, 2000, and then asks a number of questions about In-County Periodicals volumes running back to FY1971. Counsel for the Postal Service discussed this interrogatory with counsel for NNA on or about May 1, 2000 in an effort to understand what was being sought and why it might be available. That discussion also addressed the Postal Service's incipient responses to NNA/USPS-T5-36 and 39, which sought details regarding In-County volumes as far back as 1986; the undersigned counsel advised NNA counsel that the original objections to these latter interrogatories were being withdrawn because it had been determined that the older data in which NNA was interested simply were unavailable. The undersigned counsel also advised NNA counsel that an objection based on lack of timeliness would yet be forthcoming regarding NNA/USPS-15, while also indicating that the requested information were not available.

WHEREFORE, the United States Postal Service objects to interrogatory  
NNA/USPS-15.

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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