

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 THE UNITED STATES POSTAL SERVICE TO THE MCGRAW-HILL
COMPANIES, INC. INTERROGATORY
(MH/USPS-5)
(May 15, 2000)

The United States Postal Service hereby objects to the McGraw-Hill Companies, Inc. interrogatory MH/USPS-5, filed on May 5, 2000. The interrogatory is clearly untimely.

MH/USPS-5 is a multi-part interrogatory, requesting information concerning USPS-LR-I-87. (Attachment A is a copy of the interrogatory.) McGraw-Hill requests either the all Log Sheets or, in the alternative, various data compilations from the log sheets.

USPS-LR-I-87 was filed with the Postal Service's direct case in January. It was clearly listed as associated with the direct testimony of witness Yacobucci. See USPS-T-25, at 6. Thus, any questions on the library reference should have been filed no later than March 23, 2000.

Accordingly, the Postal Service should not be required to respond to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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.



Susan M. Duchek

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May 15, 2000

MH/USPS-5: Please refer to USPS-LR-I-87, pp. 10, 71, 84-106:

(a) Please provide in full all Log Sheets that were maintained for purposes of the survey, redacting only publication names (and not redacting transactions that were not ultimately sampled for the survey).

(b) In the alternative, please provide the following information:

(i) For each transaction listed on any and all Extra-Large Transactions (>250,000) Log Sheets maintained for purposes of the survey (including, without limitation, those transactions that were not ultimately sampled for the survey), please list the total number of pieces for each such transaction separately, and specify whether the transaction involved Periodicals Regular mail, Periodicals Nonprofit mail, or commingled Regular and Nonprofit Periodicals mail.

(ii) For each transaction listed on any and all Large Transactions (>50,000-250,000) Log Sheets maintained for purposes of the survey (including, without limitation, those transactions that were not ultimately sampled for the survey), please list the total number of pieces for each such transaction separately, and specify whether the transaction involved Periodicals Regular mail, Periodicals Nonprofit mail, or commingled Regular and Nonprofit Periodicals mail.

(iii) For each transaction listed on any and all Medium Transactions (>10,000-50,000) Log Sheets maintained for purposes of the survey (including, without limitation, those transactions that were not ultimately sampled for the survey), please list the total number of pieces for each such transaction separately, and specify whether the transaction involved Periodicals Regular mail, Periodicals Nonprofit mail, or commingled Regular and Nonprofit Periodicals mail.

(iv) For each transaction listed on any and all Small Transactions (0-10,000) Log Sheets maintained for purposes of the survey (including, without limitation, those transactions that were not ultimately sampled for the survey), please list the total number of pieces for each such transaction separately, and specify whether the transaction involved Periodicals Regular mail, Periodicals Nonprofit mail, or commingled Regular and Nonprofit Periodicals mail.

(c) Please provide similar information for bulk First-Class flat mailings, and for Standard A Regular and Nonprofit flat mailings, for BY 1998 and/or FY 1999.

(d) For those periods, please provide any and all information regarding the density (volumes to individual zones) of bulk First-Class flat mail, Standard A Regular and Nonprofit flat mail, and Periodicals Regular and Nonprofit flat mail, respectively.