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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
(MPA/USPS-60)  
(May 18, 2000)

The United States Postal Service hereby objects, in part, to Magazine Publishers of America, Inc. interrogatory MPA/USPS-60. The information requested is irrelevant, commercially sensitive, and would be burdensome to produce.

MPA/USPS-60 states, in pertinent part:

Please provide a copy of PS Form 5366, with associated instructions. Please provide the summary Amtrak utilization data derived from Form 5366 in whatever format such data were made available to postal transportation management personnel in BY98.

The Postal Service will provide a copy of the form and associated instructions; it objects to providing summary utilization data.

The relevance of this information is not clear. The cost pool for Amtrak speaks for itself. Information on utilization data adds nothing of value to the record. In addition, the utilization data likely would reveal certain point-to-point information, which both the Postal Service and Amtrak consider commercially sensitive. Postal Service competitors and potential transportation providers could make use of this information to the obvious detriment of the Postal Service. Also, Amtrak considers this information commercially sensitive and does not want it revealed to its other customers or competitors.

Also, the requested information would be very burdensome to produce. PS Form 5366 is prepared manually. A separate form is prepared at each stop for each train, each day. Approximately 250 to 500 forms are completed each day. At minimum, this means that there would be approximately 91,250 manually prepared forms containing data for BY 98 (250 forms x 365 days). Two people are assigned to Amtrak -- one for operational work and the other for contractual work. Both have other assignments besides Amtrak. Extracting and summarizing data from 91,250 forms is clearly unduly burdensome.

For all of the above reasons, the Postal Service objects to providing anything other than the requested form and associated instructions.

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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