

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 CARLSON INTERROGATORIES DFC/USPS-24-27
(May 22, 2000)

The United States Postal Service hereby objects to interrogatories DFC/USPS-24-27, filed on May 10, 2000. These interrogatories, which purport to follow-up on responses of witness Robinson to question posed at hearing, is in many ways inappropriate and untimely discovery. First, to the extent that these questions pertain to the subject matter of the question posed at hearing, Mr. Carlson had an opportunity to follow-up at the hearing. By choosing not to participate in hearings, Mr. Carlson has waived his opportunity to pose questions that could have been posed then. Second, each of the questions now posed by Mr. Carlson could easily have been posed at an earlier stage in the case, and he should not now be permitted to further extend the discovery period on the Postal Service on the pretext of following up on hearing questions. For example, with respect to question 24, parts a, c, e, relating to point specific service standards, could have been posed much earlier in the case. See DFC/USPS-T34-7 (Service standards Oakland CA to Raleigh NC), DFC/USPS-T34-9 (Service standards Bangor ME to Bangor ME). Subparts b, d and f could also have been asked as followup to DFC/USPS-T34-7. With respect to part g, Mr. Carlson could have followed up on the "problem" of potentially misleading information on terminals at hearings or in written discovery earlier. The Postal Service previously provided information that some First Class Mail has a one- or two-day service standard.

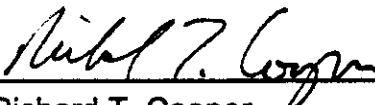
See POIR 6 question 10. With respect to DFC/USPS-T34-25, the Postal Service also objects on the grounds of relevance, since the terminal programming at issue does not affect any of the rates or rate making criteria at issue in this case. With respect to DFC/USPS-T34-26, this question could have been posed as follow up to the response to DFC/USPS-T34-7, which indicated that "The NCR POS ONE system indicates a Priority Mail service standard (either two days or three days) . . ." A One-day service standard was also discussed in the response to POIR 6 question 10 and was the subject of motions practice surrounding DFC/USPS-T34-53 which referred back to DFC/USPS-T34-13 (in SAME set of responses as DFC/USPS-T34-7). Mr. Carlson has had his opportunity to conduct discovery on these issues. With respect to DFC/USPS-T34-27, the Postal Service again objects on grounds of relevance and untimeliness. This question shares the same infirmities as DFC/USPS-T34-24.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

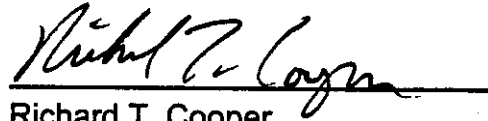


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May 22, 2000

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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