

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

OPPOSITION OF UNITED STATES POSTAL SERVICE
TO CARLSON MOTION TO COMPEL RESPONSES TO
INTERROGATORIES DFC/USPS-T34-24-26
(June 9, 2000)

On May 30, 2000, Douglas F. Carlson moved to compel responses to interrogatories DFC/USPS-T34-24-26, filed on May 10, 2000. The Postal Service had objected to these interrogatories as lacking relevance to the matters at issue in this proceeding, and as inappropriate follow-up. See *Objection of United States Postal Service to Carlson Interrogatories DFC/USPS-24-27* (May 22, 2000).

The Postal Service remains concerned that many of these questions could have been posed earlier in the proceeding, rather than at this late stage under the guise of purported follow-up. As stated in its objections, many of these questions bear on issues explored much earlier in the proceeding, and could have been raised prior to the end of discovery on the Postal Service's direct case. See *Objection of United States Postal Service to Carlson Interrogatories DFC/USPS-24-27* (May 22, 2000). The Postal Service also stands by its relevance objections. For example, with respect to interrogatory 25, the estimated date on which NCR and IBM retail terminals will be programmed to provide certain service-standard information for First-Class Mail has absolutely no bearing on the rate and classification issues to be determined in this case, regardless of the theories that Mr. Carlson may ultimately present on brief.

Nevertheless, in an effort to resolve these outstanding discovery disputes with the minimum of wear and tear on the resources of the Postal Service and the Commission,

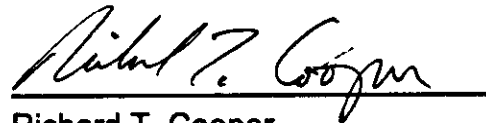
the Postal Service is willing to provide, over objection, responses to interrogatories 25 and 26.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

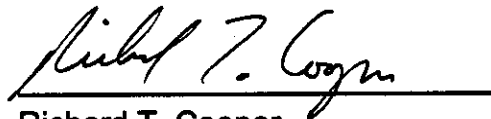


Richard T. Cooper

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June 9, 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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June 9, 2000