

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

OBJECTION TO ASSOCIATION OF PRIORITY MAIL USERS, INC.
INTERROGATORIES APMU/UPS-1 and 2
(June 29, 2000)

United Parcel Service hereby objects to the Association of Priority Mail Users, Inc.'s interrogatories APMU/UPS-1 and APMU/UPS-2, on the grounds stated herein.

Interrogatory AMPU/UPS-1 requests information regarding the "total volume of packages and parcels that UPS accepts within the United States for second-day domestic delivery." The requested information includes:

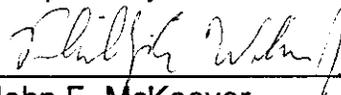
- (a) The percentage that pays UPS's published rates;
- (b) The percentage that pays a net rate lower than the published rates;
- (c) The average reduction from the published rates;
- (d) The least amount of discount or rebate that UPS gives when it negotiates a contract with a shipper; and
- (e) The portion of second day delivery packages that are delivered on or before the second day. Interrogatory APMU/UPS-2 asks the same questions about UPS's 3-Day Select service.

The requested information is not relevant to the establishment of proper postal rates, nor is it reasonably calculated to lead to the discovery of admissible evidence in

this proceeding, which involves the Postal Service's costs and revenues, not those of UPS. The Commission has consistently held that information of this type need not be disclosed in a postal rate proceeding because it is clearly proprietary and commercially sensitive. See, e.g., Presiding Officer's Ruling No. R97-1/104 (February 27, 1998); Presiding Officer's Ruling No. R94-1/64 (August 19, 1994); Presiding Officer's Ruling No. R90-1/66 (September 7, 1990); Presiding Officer's Ruling No. R87-1/148 (November 10, 1987).

Furthermore, even assuming the information had some tangential relevance -- which it does not -- producing it would require a special study, thereby imposing an undue burden on UPS.

Respectfully submitted,



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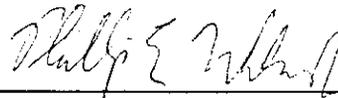
and

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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson
Attorney for United Parcel Service

Dated: June 29, 2000
Philadelphia, Pa.

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