

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

UNITED STATES POSTAL SERVICE
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO MPA WITNESS HAY
(USPS/MPA-T4-8)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to MPA witness Hay: USPS/MPA-T4-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
July 14, 2000

USPS/MPA-T4-8. Please refer to your response to interrogatory USPS/MPA-T4-5. This interrogatory requested copies of all contracts, agreements (including confidentiality and non-disclosure agreements), task orders, job descriptions, work proposals or other documents relating to your duties on the A.T. Kearney Data Quality Study discussed in your testimony.

- a) Please confirm that, notwithstanding the fact that you did not produce one in response to interrogatory USPS/MPA-T4-5, you did execute a confidentiality agreement in connection with your work for A.T. Kearney on the Data Quality Study. If you do not confirm, please explain fully.
- b) Please confirm that the attached document is a copy of a Confidentiality Agreement that was signed by you in connection with your work for A. T. Kearney on the Data Quality Study. If you do not confirm, please explain fully, including a full description of what you believe the attached document to be.
- c) Please provide a more legible copy of the Confidentiality Agreement referred to in part b), above.
- d) Please provide any other documents requested in interrogatory USPS/MPA-T4-5 that were omitted from your response.

CONFIDENTIALITY AGREEMENT

**UNITED STATES POSTAL SERVICE
CONTRACT NO. 102590-97-B-1972**

During the term of this Agreement, I acknowledge that I will be exposed to and receive information regarding the United States Postal Service, its rate structures, employees and its operations as is reasonably required to perform my obligations under this contract. I will keep in confidence and prevent the disclosure to any person or persons outside the USPS Project all information which is received under this Agreement.

Because the data being gathered and the resulting information to be delivered on USPS rate structures will be of vital importance to the USPS, I agree that I will not disclose to any individuals outside of the USPS Project any of the following:

1. The nature or purpose of the USPS Project including, without limitation:
 - a. Documentation gathered/assembled during this Project.
 - b. Documentation provided by the prime contractor and subcontractor/consultants relating to similar studies or relevant issues.
2. Methods and procedures used or observed.
3. Specific recommendations and/or quantitative output of the Project.
4. Any other item deemed by the prime contractor to be a product or by-product of the Project.

Notwithstanding the language set forth above, I am not liable for disclosure or use of such information if the same:

1. Is in the public domain at the time it is disclosed; or,
2. Is already known to me at the time of receipt; or,
3. Became known to me from a source other than the disclosing party without breach of this Agreement.

Signature: 

Name: Keith A. J. HAY

Title: Consultant; CEO ECONOLYNX/PSI.

Date: 4th July 1998.

Attachment To Interrogatory
USPS/MPA-T4-8

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.


Richard T. Cooper

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