

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO OFFICE OF
THE CONSUMER ADVOCATE INTERROGATORY OCA/USPS-ST44-44
(July 31, 2000)

The United States Postal Service hereby objects, in part, to Office of the Consumer Advocate interrogatory OCA/USPS-ST44-44, directed to witness Patelunas on July 21, 2000. A portion of the interrogatory requests pre-decisional, commercially sensitive, and irrelevant information.

The interrogatory states:

Please provide the basis for all of the assumptions together with related documentation supporting the estimates indicated on page 8, lines 16-17 of your testimony that the following test year revenue will be generated by the new programs: E-commerce-\$104 million, co-branded advertising-\$100 million and Retail Product sales-\$100 million.

The Postal Service objects to providing documentation relating only to the E-commerce portion of the interrogatory.

Documentation for E-Commerce test year revenue projections are contained in a DAR and in Postal Service Business Plans. Both types of documents contain materials that have been used as inputs to the decision-making process on E-Commerce initiatives, and thus are protected from disclosure as pre-decisional. Also, both types of documents could reveal information about the Postal Service procurement process that may be proprietary to both the Postal Service and its contractors, and likely would be of value to competing bidders and/or competitors. The Business Plans may contain commercially sensitive information on financial arrangements between the Postal

Service and various third parties. Such information could include details concerning the third parties' costs, as well as details of the allocation of revenues and expenses between the Postal Service and these third parties. This information would be considered commercially sensitive by both the Postal Service and the third parties. It is also irrelevant.

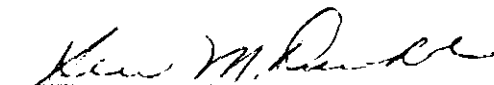
The Postal Service thus objects to providing such information in response to the E-Commerce portion of interrogatory OCA/USPS-ST44-44.

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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July 31, 2000