

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

AUG 1 4 41 PM '00

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES MMA/USPS-T24-23(c)-(l)
(August 1, 2000)

The United States Postal Service hereby objects to the following interrogatories directed by Major Mailers Association to witness Miller: MMA/USPS-T24-23(c)-(l), filed July 24, 2000.

These questions are directed to Postal Service witness Miller (USPS-T-24), whose testimony in this proceeding pertained to the cost basis for the Postal Service's First-Class Mail workshare discounts proposals. Subparts (c) through (l) of MMA/USPS-T24-23 seek to explore witness Miller's expertise on the cost basis for the Postal Service's proposed discounts and the mail preparation activities of mailers who seek to qualify for those discounts. The questions are not "institutional" in any respect. Because these questions pertain to witness Miller's direct testimony, they were required to have been directed to him no later than March 23, 2000, in accordance with Presiding Officer's Ruling No. R2000-1/4 (February 25, 2000). Because these questions are untimely, the Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

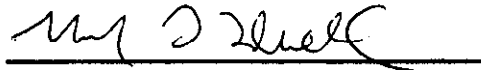
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", is written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
August 1, 2000