

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

RECEIVED  
AUG 2 4 35 PM '00

COMPLAINT ON POST E.C.S.

POSTAL RATE COMMISSION  
OFFICE OF THE CLERK  
Docket No. C99-1

**UNITED STATES POSTAL SERVICE NOTICE OF FILING COMMENTS OF  
CANADA POST CORPORATION**  
(August 2, 2000)

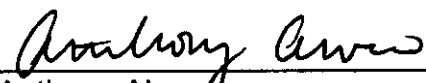
The United States Postal Service hereby gives notice of the filing of the attached comments of Canada Post Corporation. In its comments, Canada Post expresses its concern for disclosure of its commercial information as well as its support for the Postal Service's Motion for Clarification and Partial Reconsideration of Presiding Officer's Ruling No. C99-1/16, filed on July 25.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

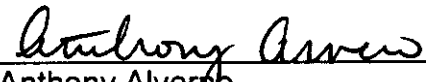
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Anthony Alverno  
Attorney

**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.

  
\_\_\_\_\_  
Anthony Alverno

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2997; Fax -6187  
August 2, 2000



Canada Post  
Corporation

Société canadienne  
des postes

**LEGAL AFFAIRS**

*Richard Salmon*  
1 DUNDAS ST. W. SUITE 700  
TORONTO, ON M5G 2L5

Tel. (416) 204-4556  
Fax (416) 204-4579

**By Facsimile**

August 2, 2000

Mr. Anthony Alverno, ESQ.  
Attorney  
USPS Law Department  
International & Ratemaking Law Section  
475 L'Enfant Plaza, SW Room 6604  
Washington, DC  
20260 - 1137  
USA

Dear Mr. Alverno:

Re: PRC Docket No. C99-1; Post ECS

I write as counsel for Canada Post Corporation ("CPC") concerning the pending motion brought by the United States Postal Service (the "USPS") for clarification and partial reconsideration of Presiding Officer's Ruling No. C99-1/16, and the answers in opposition to that motion filed by United Parcel Service ("UPS") and the Office of the Consumer Advocate. I would like to reiterate CPC's view that the release of CPC-related documents to the public will be likely to cause irreparable harm to CPC, as the information contained in those documents could be used by CPC's competitors (including UPS) to their advantage in establishing similar services in Canada.

The documents that CPC provided to the USPS in connection with Post ECS were submitted on the understanding that these documents would be treated confidentially by the USPS. In addition, the documents themselves contain privileged and/or highly sensitive commercial information. The release of any such information could readily be used by CPC's competitors to harm CPC's existing and future business. CPC therefore supports the USPS Motion to the extent it seeks reconsideration of the relevance of CPC documents. CPC further supports the USPS Motion to the extent it seeks to redact information about foreign markets and foreign posts. Such information is not relevant to the substance of the complaint, which concerns the USPS's Post ECS product, and not CPC's Post ECS product. To the extent that any such documents must be disclosed, we would respectfully submit that any document (even if partially redacted) in which CPC is mentioned should be disclosed only under strict protective conditions.

We respectfully request that you file this letter with the Postal Rate Commission so that CPC's views on this subject may be made known to the Presiding Officer.

Thank you for your cooperation and assistance in this matter.

Yours very truly,

Richard Salmon  
Counsel, Legal Affairs