

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES STAMPS.COM/USPS-7 THROUGH 11
(August 7, 2000)

The United States Postal Service hereby objects to the following interrogatories directed to it by Stamps.com on July 31, 2000: STAMPS.COM/USPS-7 through 11. These institutional interrogatories are objectionable on several grounds.

Interrogatories 7, 9 and 10 seek to explore the rationale the selection of the benchmark for the Postal Service's Docket No. R97-1 and R2000-1 Qualified Business Reply Mail postage discount proposals. As for Docket No. R97-1, Stamps.com is free to peruse the record in that proceeding to obtain an understanding of the genesis of the QBRM postage discount. With respect to Docket No. R2000-1, the basis for the proposed discount was one of the subjects addressed in the direct testimony of Postal Service witness Campbell (USPS-T-29). Because the basis for the discount is squarely within the scope of witness Campbell's direct testimony, these questions 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). In addition, discovery requests at this stage of the proceeding are permissible solely for the purpose of obtaining information available only from the Postal Service (such as operating procedures or data) that a party might consider using in the development of rebuttal testimony. Because these interrogatories do not serve such a purpose, they are not permitted by Rule 25(a) of the Commission's Rules of Practice and Procedure.

Interrogatories 7, 8 and 11 seek the Postal Service's analysis of the benchmark selected by Stamps.com and E-Stamp as a basis for measuring PC Postage

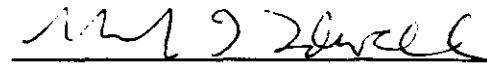
worksharing cost avoidance. For the reasons stated above, these interrogatories also are not permitted by Rule 25(a). Accordingly, the Postal Service objects.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



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.



Michael T. Tidwell

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