

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 UNITED STATES POSTAL SERVICE
TO APMU INTERROGATORIES APMU/USPS-ST44-1(f), 2
TO WITNESS PATELUNAS
(August 10, 2000)

The United States Postal Service hereby objects to interrogatories APMU/USPS-ST44-1(f), 2, filed on July 31, 2000.

Interrogatory 1(f) seeks "copies of all invoices, agreements, and other supporting documents confirming additional payments to Emery that are included in the additional costs" identified in response to subpart a of this question. The Postal Service objects to the provision of this information on the grounds of relevance and undue burden. The prior subparts of the question ask for descriptions of the nature of any additional payments made to Emery (if any). The provision of invoices and other items documenting such payments would add little to the responses to these prior questions (again assuming that any such payments to Emery are involved), but would involve a very time-consuming records search. The Postal Service objects to having to delve into such minutia at this late stage of the proceeding.

Interrogatory 2 is a repeat of a question filed long ago in this case by APMU, interrogatory 37 to witness Robinson. At that time, the Postal Service objected to the provision of an unredacted version, on the grounds that the unredacted version would disclose commercially sensitive information. In Presiding Officer's Ruling No. R2000-1/51 (April 20, 2000), the Presiding Officer ruled against the provision of an unredacted copy:

In order to accommodate the Service's concerns regarding commercial sensitivity, it shall respond to APMUIUSPS-T34-37 by submitting as a library reference a copy of the September, 1999 report in the redacted form in which it was provided in response to the FOIA request to which the Service's pleading refers.

Ruling 51 at 9. This ruling disposes of APMU's belated, redundant, cumulative, unauthorized and otherwise wholly objectionable attempt to gain the material it was earlier denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 10, 2000

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.


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