

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

**PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORY TO  
SUSAN MAYO (OCA/USPS-T35-4(j))  
(October 11, 2001)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to parts of interrogatory OCA/USPS-T35-4(j), filed on October 1, 2001. The grounds for the objection are that the interrogatory requests information that is commercially sensitive and privileged.

Interrogatory 4(j) requests certain Express Mail service standards by postal designated regions. The Postal Service has no objection to providing service standard data, and will do so formally when it files its answer to the interrogatory. However, the Postal Service does object to providing the data on a regional basis due to the commercial sensitivity of the requested information. The disclosure of Express Mail service standards on a regional basis would provide Postal Service competitors an unfair advantage in the expedited delivery market. Consequently, and consistent with Commission precedents,<sup>1</sup> the Postal Service intends to supply the requested information on a national basis.

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<sup>1</sup> See POR No. R94-1/22 (June 3, 1994), where the Commission agreed with the Postal Service that the disaggregation of Express Mail delivery data posed a

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

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Joseph K. Moore

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potential competitive harm and could conceivably be used by competitors to the Service's detriment.