

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, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY OCA/USPS-T36-40
(October 22, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory OCA/USPS-T36-40 to witness Mayo, filed by the Office of the Consumer Advocate on October 12, 2001, on the grounds of relevance, materiality, and burden.

Interrogatory 40 asks six questions about claim rules and procedures for insured international mail, focusing on liability limits imposed on mail destined overseas. This docket concerns domestic rates and fees, and the Postal Service is not asking the Commission for recommendations on insurance for international mail. Interrogatory 40 therefore is beyond the scope of this docket, and lacks relevance and materiality to any issues in this docket.

The interrogatory asks for the FY 2000 limit on insurance liability for each of the many overseas countries to which the Postal Service provides service (part c), and requests a volume and revenue breakdown for each of over 50 value increments for international mail sent overseas in FY 2000 and FY 2001


(part e). Given the lack of relevance of such information to this docket, the burden of obtaining and presenting it is not justified.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

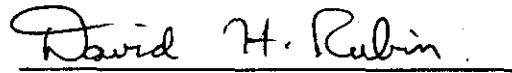
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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.


David H. Rubin

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October 22, 2001