

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

**UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.
AND VAL-PAK DEALERS' ASSOCIATION DIRECTED TO WITNESS HOPE
(VP/USPS-T31—9(G) AND 11)**

The Postal Service hereby objects to interrogatory VP/USPS-T31—9(g) and 11, filed on October 11, 2000. Interrogatory 9(g) asks whether the Postal Service has "considered imposing" a surcharge on all Enhanced Carrier Route (ECR) detached address label (DAL) pieces in lieu of a surcharge on ECR parcels. Interrogatory 11 asks whether the Postal Service has "ever considered" establishing a distinct rate or surcharge for ECR DAL mailings. The Postal Service objects to these interrogatories on grounds that they (i) extend beyond the scope of this docket and (ii) are subject to deliberative process privilege.

The Postal Service is not proposing a surcharge on, or rate category for, DAL pieces in this docket. Thus, the interrogatories delve into matters that are not at issue in this proceeding. Moreover, responding to these interrogatories necessarily requires that the Postal Service reveal whether or not it has (or had) intentions to propose a new surcharge or rate category for DAL pieces in a Commission proceeding. Such discovery is unwarranted as it probes into predecisional deliberations protected by the deliberative process privilege.

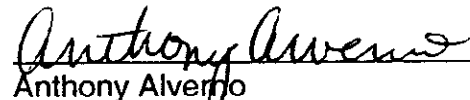
Although the Postal Service objects to these interrogatories, it currently intends to file responses. If responses are filed, the Postal Service does not intend to waive its right to object to follow-up or related discovery.

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

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