

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

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORY UPS/USPS -T21-2
(October 22, 2001)

The above interrogatory was filed on October 10, 2001. The question reads as follows:

UPS/USPS-T21-2. Refer to Library Reference USPS-LR-J-72, LR-J-72.DOC page 8. Assign the \$17,638,289 in advertising for Online Service to individual products. If this cannot be done, explain why not. Identify where the total revenue and total cost of these Online Services can be found.

The Postal Service anticipates filing a response which will, among other things, explain why it is not providing the requested breakout of the \$17.6 million figure to individual products. This would appear to be responsive to the question posed, which seeks either a breakout, or an explanation. Nevertheless, by filing such an answer, the Postal Service does not wish to be perceived as having waived its objection to providing the breakout sought. In order to preserve its position, the Postal Service is objecting to the question as seeking information which is irrelevant to this proceeding, and which is in certain part proprietary commercial information of the Postal Service which under good business practice would not be publicly disclosed.

Therefore, although the Postal Service will be filing a response to UPS/USPS-T2-21, that response does not waive the above-stated objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

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.



Eric P. Koetting

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