

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

OBJECTIONS OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OCA/USPS-60(a)-(b), (e)

The United States Postal Service hereby objects to subparts (a), (b) and (e) of interrogatory OCA/USPS-60, filed on October 11, 2001. Subpart (a) asks:

Since December 1998, has the Postal Service performed any analyses, studies, reports or prepared any articles regarding the comparison of USPS Express Mail, Priority Mail and Parcel Post offerings with similar services offered by Federal Express and United Parcel Service? If so, please provide a copy of each. If not, please explain why the Postal Service has performed no comparisons.

Subpart (b), referring to a December 1998 Consumer Reports article, asks:

The Consumer Report article indicates that the FedEx sued the Postal Service for "false advertising." Please indicate the outcome of the lawsuit.

The Postal Service objects to these subparts on the grounds of relevance.

Whether the Postal Service has or has not conducted comparative analyses of Postal Service expedited and package services with competing products, or the reasons, if any, why the Postal Service may not have conducted such analyses, is irrelevant to the issues to be determined in this proceeding. Similarly, the outcome of a particular lawsuit by a Postal Service competitor purportedly alleging false advertising on the part of the Postal Service has no bearing on this proceeding, which involves the setting of postal rates, not the allegations of postal competitors regarding past postal advertising.

The Postal Service also objects to subpart (a) because of its broad scope, which would encompass virtually any article or market research that the Postal Service might have undertaken since December 1998 which evaluates Postal Service expedited and parcel offerings in the competitive marketplace. To search through all Postal Service documents which potentially might contain such comparisons would be a massive undertaking, potentially involving hundreds of person-hours. This burden is undue, especially given the lack of relevance of the requested material.

The Postal Service further objects to subpart (a) on the grounds that the information sought would involve proprietary, confidential market research regarding postal service and its competitive position in the marketplace. The Postal Service objects to disclosing such information, even under protective conditions, without the demonstration of a compelling need for such information in the conduct of this proceeding.

Subpart (e) requests:

For FY 2000 and FY 2001, please provide the following information in a format amenable to importing into an EXCEL spreadsheet: (1) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Priority Mail advertisements; and, (2) the number and nature of the complaint lodged with the Postal Service regarding the accuracy or truthfulness of Express Mail advertisements.

There is no nexus between the requested data and Express and Priority Mail pricing nor is the information necessary to the resolution of the issues raised in this proceeding.

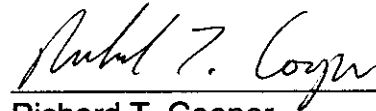
Accordingly, the Postal Service also objects to subpart (e) of interrogatory OCA/USPS-60 on the grounds of relevancy.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

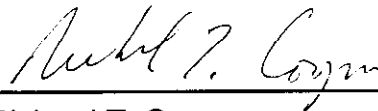


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October 22, 2001

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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