

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-000

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF UNITED PARCEL SERVICE TO WITNESS TAKIS --  
ERRATA  
(October 23, 2001)

The United States Postal Service hereby files a revised Partial Objection of United States Postal Service to Interrogatory of United Parcel Service to Witness Takis (attached). The document, filed yesterday, inadvertently referenced the interrogatory being partially objected to as UPS/USPS-T9-4, whereas the correct reference is to UPS/USPS-T19-4. The revised partial objection, attached, makes this change both in the title and in the text. No other changes have been made. The Postal Service regrets any confusion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Susan M. Duchek

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October 23, 2001

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

PARTIAL OBJECTION OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF UNITED PARCEL SERVICE TO WITNESS TAKIS  
(UPS/USPS-T19-4)  
(October 22, 2001)

The United States Postal Service hereby objects to interrogatory UPS/USPS-T19-4 to witness Takis, in part. That interrogatory requests various termination and continuing costs for four separate contracts. Revealing the information requested would be harmful to the Postal Service's negotiating posture.

UPS/USPS-T19-4 provides:

Provide all termination costs and any continuing costs that the Postal Service has or will incur separately for each of the following contracts: ANET, WNET, TNET and the PMPC contract. If exact amounts are not available, provide the Postal Service's best available estimates of the termination costs for each contract.

The Postal Service currently is involved in ongoing in negotiations to attempt to settle all of these claims; some may be successfully settled and some may proceed to litigation. Thus, final termination and continuing costs have not been incurred. Moreover, to reveal what the Postal Service estimates will be incurred for each contract would obviously severely compromise the Postal Service's negotiating position, to the detriment of the Postal Service and to the ultimate detriment of postal ratepayers.

The Postal Service will provide a partial response to the interrogatory, revealing the estimate for the aggregate termination claims for ANET, WNET and TNET, as only an aggregate figure was included in the case. Also, the Postal Service will explain that no estimate of PMPC termination costs was included in the case. The Postal Service is unwilling to reveal more than this, for the reasons set forth above.

The Postal Service believes that its partial answer will suffice and that more should not be required.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Susan M. Duchek

#### 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.

  
\_\_\_\_\_  
Susan M. Duchek

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