

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  
THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORY  
(OCA/USPS-60(h)(i))  
(October 25, 2001)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to parts of interrogatory OCA/USPS-60(h)(i), filed on October 11, 2001. The grounds for the objection are that the interrogatory requests information that is irrelevant, commercially sensitive, and privileged.

Interrogatory 60(h) requests "some 130 major markets" for Express Mail Overnight service. Interrogatory 60(i) requests a list "all remaining major markets for which the Postal Service offers Express Mail Second-Day service." There is no nexus between the requested data and Express Mail pricing nor is the information necessary to the resolution of the issues raised in this proceeding. Accordingly, the Postal Service objects to OCA/USPS-60(h)(i) on the grounds of relevancy.

The Postal Service further objects to subpart (h) and (i) on the grounds that the information sought would involve propriety, confidential data regarding the postal service and its competitive position in the marketplace. The identification of the Postal Service major Express Mail markets would provide

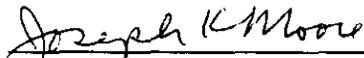
Postal Service competitors an unfair advantage in the expedited delivery market.  
Consequently, the Postal Service objects to the disclosing of such information.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

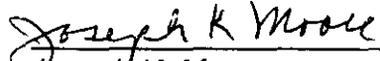
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Joseph K. Moore  
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.

  
\_\_\_\_\_  
Joseph K. Moore

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