

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES OCA/USPS-119 and 123(a)
(November 5, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories OCA/USPS-119 and 123(a), filed by the Office of the Consumer Advocate on October 24, 2001, on the grounds of relevance, commercial sensitivity, and materiality.

OCA/USPS-119:

Interrogatory 119 seeks certain Express Mail service data for each day of the week. Express Mail rates are determined on an aggregate basis without regard to the day of the week. Interrogatory 119, therefore, is beyond the scope of this docket, and lacks relevance and materiality to any issues in this docket.

Moreover, and to reiterate an objection previously filed in this docket,¹ the Postal Service vehemently objects to the release of any disaggregated Express Mail data. The potential competitive harm that would result from the release of such information far outweighs the probative value, if any, of the data. The

¹ See Objection of the United States Postal Service to OCA/USPS-29 filed on October 17, 2001.

Postal Service stands ready to provide national aggregate data. However, due to the commercial sensitivity of the data requested, the Postal Service objects to the release of information requested in interrogatory 119.

OCA/USPS-123(a):

Subpart (a) of interrogatory 123 asks for revenue and volume data for 20 individual Post Offices that do not receive Next or Second-Day Express Mail service. This request is more troublesome than that made in 119. Express Mail rates are not determined on a Post Office specific basis. Clearly, the release of such data would in no way resolve any issue in this proceeding. Consequently, the Postal Service fails to see the relevance of the requested data to Express Mail pricing.

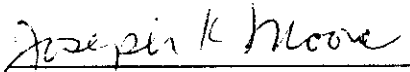
Furthermore, the potential competitive harm of disclosing Post Office specific information far exceeds any incremental contribution it could foreseeably make to the record in this proceeding. Therefore, the Postal Service objects on the grounds of commercial sensitivity.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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Joseph K. Moore

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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