

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, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORY UPS/USPS-T33-1
TO WITNESS SHARKEY
(August 4, 1997)

The United States Postal Service hereby objects to subparts (c) and (d) of interrogatory UPS/USPS-T33-1, filed on July 24, 1997. These subparts request a complete copy of the contract involved in establishing the Postal Service's Priority Mail Processing Centers (PMPCs) and all materials that were presented in response to the request for proposals for the PMPC bid.

The Postal Service objects on the ground that the information requested is confidential business information containing trade secrets of the Postal Service, of Emery Worldwide Airlines, to whom the PMPC contract was awarded, and of all other business entities submitting proposals for the PMPC bid. With respect to subpart (d), which requests materials presented in response to the request for proposals for the PMPC bid, the Postal Service further objects that insofar as such materials do not underlie the Postal Service's testimony in this case, have no bearing on PMPC or other Postal Service operations, and have no relationship to actual Postal Service costs, volumes, revenues and the like, such information is irrelevant to the issues in this proceeding. In addition, the Postal Service is concerned that the procurement



could be compromised in the future if confidential business information submitted in response to a request for proposals were subjected to disclosure in discovery, and objects to disclosure for that reason. Also with respect to subpart (d), the Postal Service objects that due to the large number of documents which would need to be reviewed and copied or otherwise produced, the burden of production far exceeds the nonexistent need for the requested information.

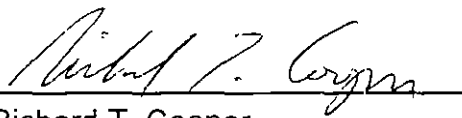
Finally, the Postal Service notes that it is in the process of collecting and reviewing information potentially falling within the scope of this interrogatory, and will attempt to determine which portions of that information, if any, do not involve the objectionable characteristics mentioned above. If such portions are discovered, the Postal Service will attempt, under appropriate conditions, to make such portions available to the requesting party. In the present circumstances, however, the Postal Service must object to the interrogatory in full.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

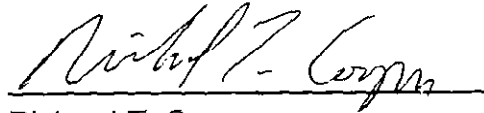


Richard T. Cooper

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August 4, 1997

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.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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