

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

PARTIAL OBJECTION OF  
UNITED STATES POSTAL SERVICE TO INTERROGATORY  
OCA/USPS-T24-35  
(August 11, 1997)

The United States Postal Service hereby objects partially to interrogatory OCA/USPS-T24-35 on the grounds that certain otherwise responsive materials are shielded by the deliberative process privilege.

That interrogatory asks the Postal Service to "identify and describe any and all [] efforts to explore alternative post office box groupings" and to provide documents that resulted from such efforts. The Postal Service continues to consider means of regrouping post office box fees, but as yet has reached no determination regarding how best to do so. In keeping with the purpose of the deliberative process privilege, the Postal Service objects to identifying or describing its current consideration.

Although they pre-date the Commission's Docket No. MC96-3 Opinion, the Postal Service does have some materials that can be provided at this time. As part of a contract with Price Waterhouse in late 1995 and early 1996, some information was collected. The Postal Service has been able to locate the Statement of Work (SOW), and believes it will also be able to locate the report that was generated. Those materials will be provided in a response to the interrogatory.

It may also be that a future SOW will be issued, in which case it will then be provided as a supplementary response to this interrogatory.

Counsel for the Postal Service left a message with Ms. Dreifuss seeking to discuss this partial objection in advance of its filing, since one reading of the interrogatory would permit the Postal Service to respond to the interrogatory without having to address privileged materials. That voice message did not bear fruit, with the result that this partial objection is being filed.

WHEREFORE, the United States Postal Service partially objects to interrogatory OCA/USPS-T24-35.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Kenneth N. Hollies

**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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Kenneth N. Hollies

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