

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

ERRATA TO PARTIAL OBJECTION OF  
UNITED STATES POSTAL SERVICE TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(September 5, 1997)

The United States Postal Service filed a partial objection to interrogatory OCA/USPS-T22-22(c) on September 2, 1997. That document contained two errors corrected by this pleading: it misidentified the interrogatory in question and omitted one of the intended grounds. The partial objection also promised an affirmative response to the interrogatory, which is being provided today. Accordingly, no party should be prejudiced by the errors, since any evaluation of whether to file a motion to compel would likely await an opportunity to review the materials actually provided.

The intended interrogatory is number 2(c), rather than 22(c) (which as yet does not exist); this is apparent to a careful reader since the partial objection discussed the substance of OCA/USPS-T22-2(c). The omitted ground for the partial objection was confidential business information. Since the affirmative response provided today answers the substance of the whole of interrogatory OCA/USPS-T22-2 directly and completely without providing any confidential business information, and since there is a substantial overlap in this instance between the coverage of the deliberative process privilege and confidential business information, this issue will likely prove moot.

WHEREFORE, the United States Postal Service files these two errata to the Partial Objection of United States Postal Service to Interrogatory of the Office of the

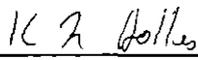
Consumer Advocate, filed September 2, 1997, regarding interrogatory OCA/USPS-T22-2(c).

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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