

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 UNITED STATES POSTAL SERVICE
TO INTERROGATORY UPS/USPS-T16-4

The United States Postal Service hereby objects to interrogatory UPS/USPS-T16-4, filed on November 1, 2001. This interrogatory asks:

Does the Postal Service currently conduct, or is the Postal Service planning to conduct, any other studies of its carrier operations? If so, describe the studies in detail. If none are planned, explain why not.

The Postal Service objects to this interrogatory on the grounds of relevance, that the question calls for disclosure of preliminary, pre-decisional materials, and that the question calls for the disclosure of privileged communications between counsel and Postal Service employees and consultants regarding potential future rate litigation.

Although the Postal Service may have under consideration one or more future studies of city carrier operations, any such studies would be only in the preliminary, initial stages, and would not produce reliable cost estimates in sufficient time to be usable in this proceeding. Since inquiry into such studies would not lead to the production of admissible evidence, the Postal Service objects to producing any information, detailed or otherwise, regarding such preliminary study designs, if any. Furthermore, since no study plans have been finalized at this time, the Postal Service objects to providing explanations or any other information about the status of its

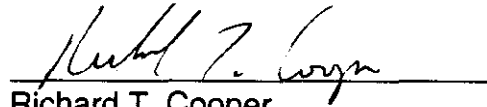
ongoing decision-making regarding whether or not to pursue particular study approaches. Disclosure of such pre-decisional, preliminary discussions could significantly interfere with the Postal Service's ability to evaluate potential study approaches. Finally, the Postal Service objects to disclosing the substance of confidential communications between counsel and staff regarding future rate litigation.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

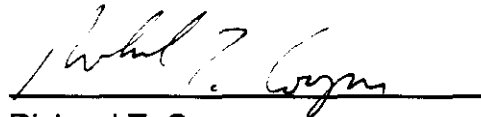
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
November 13, 2001

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993 Fax -5402
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