

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 INTERROGATORIES  
MPA/USPS-T17-2(b) THROUGH (e) AND PARTIAL OBJECTION TO  
INTERROGATORY MPA/USPS-T17-2(i)  
OF MAGAZINE PUBLISHERS OF AMERICA, INC. TO WITNESS PICKETT  
(November 23, 2001)

The United States Postal Service hereby objects in full to interrogatories MPA/USPS-T17-2(b) through (e) and in part to interrogatory MPA/USPS-T17-2(i), directed to witness Pickett. The requested information is irrelevant and commercially sensitive.

MPA/USPS-T17-2(b) through (e) requests the "per-unit rate that Amtrak charged the Postal Service" for FY1998, FY1999, FY2000, and the projected rate for FY2003. The relevance of this information to any issue in this proceeding is not clear. The cost pool for Amtrak speaks for itself. Further information of the type requested adds nothing of value to the record. In addition, the information is commercially sensitive. Both competitors and potential transportation providers could make use of this information to the obvious detriment of the Postal Service. Also, Amtrak presumably would not want its other customers or competitors to know the rates it charges the Postal Service.

MPA/USPS-T17-2(i) requests all Postal Service contracts with Amtrak for FY1998, FY1999, and FY2000. The Postal Service will file a partial response pointing out that the standard Amtrak contract language was provided in USPS-LR-I-266 in Docket No. R2000-1. Attachments to the contract that contain specific volume or cost-

related information are not provided in the publicly released versions of the contract and will not be provided here. As indicated above, this type of information would be considered commercially sensitive by both the Postal Service and Amtrak, neither of whom would want their competitors or their other customers to know the rates paid or charged under this contract. Also, the relevance of the information is questionable, as the costs associated with Amtrak are included in the Amtrak cost pool; more information should not be needed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

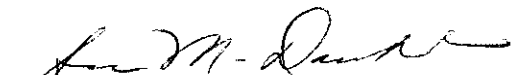
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

### 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.



Susan M. Duchek

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