

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 OF
AMAZON.COM, INC. TO WITNESS XIE
(AMZ/USPS-T2-8)
(November 23, 2001)

The United States Postal Service hereby objects to interrogatory AMZ/USPS-T2-8 directed to witness Xie. The requested information is irrelevant and commercially sensitive.

AMZ/USPS-T2-8 asks, "What is the average rate charged by railroads to ship a van (on a flat car) the average distance to Zone 5? To Zone 6? To Zone 7?" The relevance of this information to any issue in this proceeding is not clear. The cost pool for freight rail 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 existing and potential transportation providers could make use of this information to the clear detriment of the Postal Service. Also, the Postal Service's freight rail contractors presumably would not want their other customers or competitors to obtain information on the rates they charge the Postal Service. While it is true that the interrogatory asks for the average rate, the various railroads (whether current or potential future contractors) could obviously improve their bidding or bargaining positions by determining where their rates fall in relation to the average.

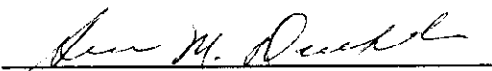
The Postal Service should not be required to provide the information requested.

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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