

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
Nov 26 4 37 PM '01  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO UPS INTERROGATORY UPS/USPS -16  
(November 26, 2001)

The United States Postal Service hereby objects to UPS/USPS-16, filed on November 15, 2001. The question reads as follows:

UPS/USPS-16. Refer to the Postal Service's response to Interrogatory UPS/USPS-T21-4, redirected from Witness Kay, regarding the Postal Service's product promotion activities for Priority Mail, Express Mail, and Parcel Post at mail and parcel events and conferences. In that interrogatory response, the Postal Service states that sales personnel follow up on leads generated by customers who visit the exhibits. Identify the number of sales leads generated for each Postal Service product promoted at these events as a portion of the total sales leads generated.

The question seeks information that is irrelevant, that is commercially sensitive to the extent that it exists, and that would be unduly burdensome to develop to the extent that it does not exist.

What UPS is apparently seeking in this question is an indication of, for example, what portion of total Priority Mail sales leads are Priority Mail sales leads generated from trade shows. That information bears no discernible relationship to any issue in this proceeding. If 10 percent of Priority Mail sales leads come from trade shows, or if 90 percent of Priority Mail sales leads come from trade shows, what difference would that make on the rates to be recommended by the Commission? The information sought, therefore, is fundamentally irrelevant.

The information, however, equally obviously would have commercial value. What competitor would not like to know how useful trade shows are in terms of lead generation for the products with which it competes? The Postal Service has a clear and legitimate basis not to make such commercially-valuable information available to its competitors.

An equally serious, but much more pragmatic, difficulty posed by the question is the virtual impossibility of breaking sales leads down to products (in the CRA-sense of products). For example, while it may not be difficult to identify a sales lead as relating to package services, the exact product (e.g., Priority Mail, Express Mail, Parcel Post) that would best suit the customer's needs cannot be known until an analysis is conducted of that customer's business practices. Moreover, some customers may eventually find more than one postal product useful to meeting their needs under varying circumstances. Therefore, sales lead information by CRA-product (either as relating to the subset of trade show sales leads, or the universe of sales leads) does not exist, and would be extremely burdensome, if not impossible, to develop.

Therefore, the Postal Service objects to UPS/USPS-16 on the grounds that it seeks information which is irrelevant, which (to the extent that it does exist) is highly proprietary, and which, to the extent that it exists only above the CRA-product level,

would be extremely burdensome, if not impossible, to refine down to the CRA-product level.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

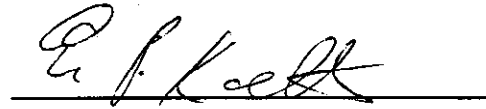
By its attorney:



Eric P. Koetting

**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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992; Fax -5402  
November 26, 2001