

RECEIVED

Dec 13 4 19 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OPPOSITION OF UNITED STATES POSTAL SERVICE
TO OCA MOTION TO COMPEL PRODUCTION OF DOCUMENTS REQUESTED
IN INTERROGATORIES OCA/USPS-180-181
(December 13, 2001)

The Postal Service hereby opposes the OCA Motion to Compel Production of Documents Requested in Interrogatory (sic) OCA/USPS-180-181. The text of these interrogatories is as follows:

OCA/USPS-180. For FY 2002, please provide a copy of the television advertising (in a format suitable for use in a standard VCR) used to advertise (a) Priority Mail and (b) Express Mail.

OCA/USPS-181. For FY 2002, please provide a copy of radio advertising (in a format suitable for use in a standard cassette tape recorder) used to advertise (a) Priority Mail and (b) Express Mail.

As noted in the objections, these interrogatories extend into FY 2002 a series of OCA requests for information regarding the content and development of Postal Service advertising for Express Mail and Priority Mail. The Postal Service objected to the relevance of these interrogatories, for the same reasons that it objected to similar interrogatories relating to advertisements from prior time periods. *See Objections of United States Postal Service To Interrogatories OCA/USPS-64-73, 77-78 (October 29, 2001), Opposition of United States Postal Service To Oca Motion to Compel Production*

of Documents Requested in OCA/USPS-64(c), 65-73, 77-78 (November 20, 2001).

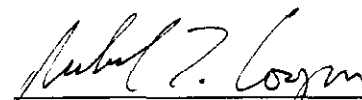
The Postal Service believes that its objections are well founded, and continues to rely on the relevance arguments articulated earlier. Postal Service rate and classification proceedings are not an appropriate forum for review of the accuracy or truthfulness of Postal Service advertisements. Such issues are beyond the jurisdiction of the Commission, and hence are irrelevant to this proceeding. In any event, given the similarity of the interrogatories at issue to those currently awaiting procedural disposition, it is sensible that all such requests for advertising materials receive a contemporaneous and consistent review by the Presiding Officer.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

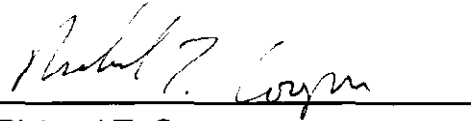
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written above a horizontal line.

Richard T. Cooper

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