

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

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF AMERICAN BANKERS ASSOCIATION &
NATIONAL ASSOCIATION OF PRESORT MAILERS
(ABA&NAPM/USPS-T29-29(a&b))

The United States Postal Service hereby objects to the following interrogatories directed by ABA&NAPM to witness Robinson on December 10, 2001:

ABA&NAPM/USPS-T29-29(a) and (b).

Subpart (a) does not ask the witness to respond with facts or opinion. Instead, it requests a legal conclusion regarding whether a circumstance described in the question constitutes "an overt case of price discrimination as defined in various antitrust statutes." Accordingly, the Postal Service objects.

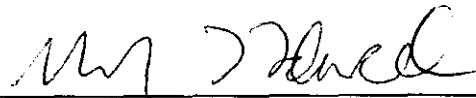
For the same reason, subpart (b) is objectionable, at least in part. This interrogatory implies that the Postal Service is or has engaged in price discrimination as defined by subsection (a) and seeks witness Robinson's affirmation of that conclusion as a premise to her response to subpart (b).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

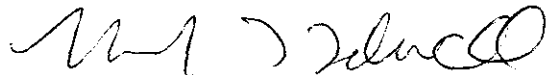
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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. Happy birthday, Dad.



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
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December 14, 2001