

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 UNITED STATES POSTAL SERVICE
TO INTERROGATORIES UPS/USPS-T30-9 and 11
(December 20, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories UPS/USPS-T30-9 and 11, filed on December 10, 2001. The text of these interrogatories are as follows:

UPS/USPS-T30-9. Refer to Attachment H to your testimony, USPS-T-30, titled "The Colography Group, Inc. - Domestic Quarterly Market Growth and Competitor Share Report - Total Second-Day and Three-Day Air Letters and Packages."

(a) Is the entire report the Postal Service received from The Colography Group, Inc. contained in this Attachment? If not, provide the entire report.

(b) Provide all reports on the market for second-day and three-day air letters and packages received by the Postal Service from The Colography Group, Inc., for the period 1996 through the present.

(c) Provide all reports on the market for second-day and three-day air letters and packages held by the Postal Service, whether produced by The Colography Group, Inc., or any other entity, including the Postal Service, for the period 1996 through the present.

(d) Identify all Postal Service products or services other than Priority Mail which you consider to be included in the market which is the subject of this report. Provide the basis for your answer.

UPS/USPS-T30-11. Refer to page 5 of your testimony, USPS-T-30, where you state that the second-day and third-day air market "definition" does not include ground services. Provide all reports on the market for ground service held by the Postal Service, whether produced by the Colography Group, Inc., or any other entity, including the Postal Service, for the period 1996 through the present.

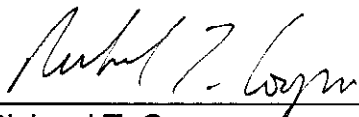
The Postal Service objects to providing the requested information, on the ground that to do so would be to a wealth of confidential, proprietary and commercially sensitive business information to a competitor of the Postal Service. The Postal Service further objects that in framing its request in the broadest possible terms so as to cover virtually all market research conducted by or for the Postal Service of interest to UPS, the interrogatory is unduly broad, and would impose an undue burden of production on the Postal Service. The Postal Service has already undertaken to produce, under protective conditions, a number of Colography reports in response to Presiding Officer's Ruling No. R2001-1/12. The Postal Service objects to producing more such information in response to a competitor's fishing expedition, especially without benefit of protective conditions. Finally, the Postal Service objects to providing information going back in time to well before the test year, which is dated and can have only limited relevance in this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

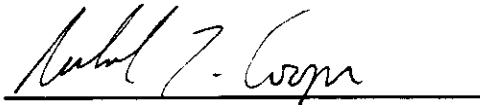


Richard T. Cooper

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December 20, 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, reading "Richard T. Cooper", is written over a solid horizontal line.

Richard T. Cooper

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