

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF ABA&NAPM/USPS-T39-9(d)-(e), and 10(d)
(December 21, 2001) (ERRATA)

This revised objection is submitted to correct for the mis-identification of the applicable interrogatories to which the objection was filed. The original objection, filed December 20, 2001, identified the objectionable interrogatories as ABA&NAPM/USPS-9(d)-(e), and 10(d). The interrogatories were propounded to witness Kingsley and are properly identified as ABA&NAPM/USPS-T39-9(d)-(e), and 10(d). The corrected full text of the objection follows:

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories ABA&NAPM/USPS-T39-9(d)-(e), and 10(d), filed by the American Bankers Association and National Association of Presort Mailers on December 10, 2001, on the grounds that the information is propriety and commercial sensitivity.

Interrogatories 9(d) and (e) seek cost study information related to DIOSS retrofits and the elimination of OCR/ISS/OSS. Interrogatory 10(d) requests cost study information justifying the purchase of additional stackers for the CSBCS. The requested cost studies are contained in the applicable Decision Analysis

Reports (DARs). The Postal Service, however, objects to the release of the DARs because the DIOSS kits and stackers for the CSBCS are currently under active procurement. Consequently, the release of such information could jeopardize the procurement process—as the Postal Service anticipates making similar purchases in the future--and further disrupt postal operations. Further, the contents of the DAR are not typically made public and, based on past Commission practices, are considered propriety.

Finally, it is worth noting that this appears to be an attempt to circumvent the discovery process. These are cost related questions and require responses beyond the scope of witness Kingsley's expertise. Clearly, these interrogatories should have been directed to the Postal Service as institutional requests. However, the discovery period for serving the Postal Service, other than follow-up questions, ended on November 26, 2001. Consequently, even if the questions were not objectionable, there would be no basis for requiring the Postal Service to respond.

Therefore, for the above stated reasons, the Postal Service objects to the release of the information sought in interrogatories ABA&NAPM/USPS-T39-9(d)-(e), and 10(d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 21, 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.

Joseph K. Moore

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