

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

Complaint on First-Class Mail Service Standards
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Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES DBP/USPS-136(d-f) AND 137(m-o)
(December 26, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files these objections to the following interrogatories filed by Mr. Popkin on December 17, 2001: DBP/USPS-136(d-f) and 137(m-o).

DBP/USPS-136(d-f)

These interrogatories inquire about differences between the handling of mail in the two subclasses that are the subject of this proceeding -- First-Class Mail Letters and Cards -- and the handling of mail within a subclass that is not at issue, Priority Mail. To the extent that these questions seek information pertinent to Priority Mail or the differences between First-Class Mail and Priority Mail, they seek information that is not relevant or necessary to a resolution of the issues raised by the complaint in this proceeding.

DBP/USPS-137(m-o)

These interrogatories seek data from the Postal Service Origin-Destination Information System (ODIS) that reflect First-Class Mail time in transit between two 3-digit ZIP Code pairs for a recent postal quarter. The Postal Service considers these "point-to-point" ODIS data to be commercially-sensitive and privileged. As indicated in pleadings pertinent to DFC/USPS-9, the Postal Service objects to disclosure of such data without adequate protective conditions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

Michael T. Tidwell

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