

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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO UPS INTERROGATORY UPS/USPS-T36-1  
REDIRECTED FROM WITNESS MAYO  
(January 11, 2002)

The United States Postal Service hereby objects to the following interrogatory of United Parcel Service: UPS/USPS-T36-1, filed on November 15, 2001. The interrogatory reads:

UPS/USPS-T36-1. Refer to your response to interrogatory OCA/USPS-T36-19(b), in which you refer to the Product Tracking System database. Refer also to your response to OCA/USPS-T36-19(d), in which you state that Priority Mail service performance reports are routinely generated from that database. Provide all reports from the Product Tracking System database regarding Priority Mail service performance from FY 1998 through the present, on a quarterly basis.

It has been discovered that the Product Tracking System at issue in the interrogatory contains a variety of point-to-point performance data derived from retail Delivery Confirmation scans. These scans are reported at a level of disaggregation as low as the performance-cluster level. The Postal Service objects to providing this disaggregated Priority Mail performance data, on the grounds of commercial sensitivity and relevance.

It is apparent that the publication of such point to point performance data would provide a marketing and planning advantage to UPS and other competitors of Priority Mail by enabling such competitors to selectively target geographical areas in which the Postal Service's service performance may be relatively slower than other areas. No

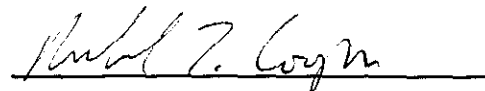
competitive business would willingly disclose such information to its competitors. Furthermore, since Priority Mail rates are not set in terms of specific performance clusters, but rather at the national level, this information has no relevance to the Commission's deliberations. The Postal Service thus objects to its provision.

The Postal Service notes, however, that in Docket No. R2000-1 it provided quarterly national delivery performance data from Delivery Confirmation scans in response to interrogatory APMU/USPS-T34-10. Over objection, the Postal Service is willing to provide available Product Tracking System data in this format. This limited response will be filed shortly.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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

Richard T. Cooper

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January 11, 2002

**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 over a solid horizontal line.

Richard T. Cooper

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