

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

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORIES
OCA/USPS-T4-15 and 17(b)(c)(e) and (f)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects on grounds of relevance and materiality to interrogatory OCA/USPS-T4-15, and to subparts (i. --vi.) of the following parts of interrogatory OCA/USPS-T4-17: (b), (c), (e) and (f), filed on November 5, 2002. The Postal Service is endeavoring to respond to those parts and subparts of these interrogatories which pertain to Change Service Requested (CSR); while the burden is substantial, it does not currently appear to be undue. However, also providing the information responsive to the questions relating to Address Service Requested, an unrelated endorsement, would likely also prove unduly burdensome notwithstanding that such burden cannot be quantified at this time. Accordingly, objections are being lodged with respect to detailed analyses regarding the Address Service Requested (ASR) endorsement, which is not at issue in this proceedings.

This proceeding seeks a waiver of the address correction service fees for electronic notices that will result from the use of CSR endorsement under the terms

of a Negotiated Service Agreement. The proposed waiver of the fee does not apply to the use of any endorsement other than the CSR endorsement. Agreement, II G. The information sought in OCA/USPS-T4-15, and OCA/USPS-T4-17 (b)(i.-vi), (c)(i.-vi.), (e)(i.-vi.) and (f)(i.-vi.) relates solely to the ASR endorsement. The detailed information and analysis sought about the ASR endorsement will not lead to the discovery of admissible evidence necessary to evaluate the requested waiver of the fees associated with the CSR endorsement. Therefore the questions are outside the scope of permissible discovery. Rule 24(a). Accordingly the Postal Service objects to Interrogatories OCA/USPS-T4-15, and OCA/USPS-T4-17 (b)(i.-vi), (c)(i.-vi.), (e)(i.-vi.) and (f)(i.-vi.).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

Nan K. McKenzie

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