

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

CUSTOMIZED MARKET MAIL MINOR
CLASSIFICATION CHANGES

Docket No. MC2003-1

**UNITED STATES POSTAL SERVICE
OBJECTION TO INTERROGATORY OF THE OFFICE OF THE CONSUMER
ADVOCATE DIRECTED TO WITNESS ASHE
(OCA/USPS-T1—19(C))**

The Postal Service objects to interrogatory OCA/USPS-T1—19(c), filed by the Office of the Consumer Advocate on March 25, 2003. Interrogatory 19(c) provides:

The following refers to USPS-LR-2, "Customized MarketMail Study Ad Agency Discussion Guide."

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c. In the discussion guide introduction, the ground rules indicate that the discussions may have been audio taped. Please provide copies of all audio tapes and video tapes made during each of the four discussions.

As explained in the Postal Service's objection to interrogatory OCA/USPS-T1-5, the Postal Service objects to the production of the audio tapes¹ on grounds of relevance, commercial sensitivity, and burden.

The tapes are not necessary for the Commission's evaluation of the market research. It must be kept in mind that the market research was only used to support a qualitative, and not a quantitative, assessment of the classification

¹ Videotapes were not taken of the focus groups.

proposal. Hence, the salient information necessary for the Commission's analysis is more than adequately covered by the full text of the report, which is marked as USPS LR-2/MC2003-1.

The tapes contain participant identifiers and company names, which, if disclosed, could reveal confidential business opinions of the focus group participants or their respective employers and clients. Focus group participants were, moreover, assured that their responses would remain confidential. To disclose information tying views and opinions to participants would violate promises made to participants and discourage consumers and business professionals from participating in future market research efforts conducted by the Postal Service or National Analysts.

In its objection to interrogatory OCA/USPS-T1-5, the Postal Service has offered to provide copies of the transcripts of the focus group sessions under the terms of a ruling authorizing redaction of all personal identifiers and company names, as well as information that could reveal the identity of a specific person, employer, or client. The Postal Service is not, however, willing to provide redacted versions of the tapes. Redacting personal identifiers and company names from the tapes would be burdensome and costly to perform. In any event, the tapes are duplicative of the transcripts, and producing the voice conversations would be of no benefit in light of the Postal Service's willingness to

furnish redacted copies of the transcripts.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 1, 2003