

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

OBJECTION OF UNITED STATES POSTAL SERVICE
TO NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORY
NAA/USPS-14, PART E
(September 8, 1997)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects to part (e) of interrogatory NAA/USPS-14, filed on August 29, 1997, on the grounds of commercial sensitivity and relevance. Part (e) requests a copy of the contract between the Postal Service and American Express concerning what NAA refers to as "lockbox service".

The Postal Service objects to part (e) because the requested contract includes confidential business information and trade secrets of the Postal Service and of American Express, disclosure of which would undermine the competitive interests of both the Postal Service and American Express.

The Postal Service further objects on the grounds of relevance, because this contract does not underlie any of the Postal Service's testimony or proposals in this case, and is unrelated to Postal Service costs, volumes, and revenues for the classes of mail and special services at issue in this proceeding.

In response to an earlier request for this contract, the Postal Service prepared a redacted copy, which protects confidential information. Despite the lack of relevance of

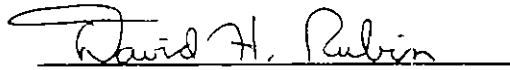
the contract to this proceeding, the Postal Service will provide this redacted copy as a library reference.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

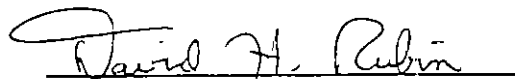
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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.



David H. Rubin

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September 8, 1997