

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE ASSOCIATION OF ALTERNATIVE POSTAL SYSTEMS**
(September 11, 1997)

The United States Postal Service hereby gives notice that it objects to an interrogatory filed on September 5, 1997, by the Association of Alternative Postal Systems.

That interrogatory, AAPS/USPS-5, begins with the premise that

[s]ince the [Docket No. MC95-1] reclassification decision especially, postal officials, including the Postmaster General, have been quoted in the press as having commented favorably on driving competitors out of business. We note specifically the PMG's reported comments about Publishers Express.

It continues by asking that the Postal Service provide copies of this statement and of any other public statements by postal officials -- oral or written -- in the past three years addressing damage to postal competitors.

The Postal Service objects to the interrogatory because it is overly vague and because it seeks to impose an undue burden. If AAPS wishes the Postal Service to find the comments or statements it alleges were made by the Postmaster General, or any other postal official, AAPS owes the Postal Service some guidance on where the comments or statements might be found.

The question asserts that the Postmaster General, at some time during the last several years, has been quoted in some journalistic medium as having made a

statement which either comments about the fate of Publishers Express or shows a disposition favorable to "driving competitors out of business" or comments about "damage to postal competitors." Or something.

The interrogatory provides no clue as to when the alleged statements or comments of the Postmaster General were supposed to have been made or in what medium they were supposedly reported. February 1996? Business Mailers Review? National Public Radio? August 1997? The Washington Post? Newsweek? December 1996? DMA News? The CBS Evening News with Dan Rather? The New York Times? June 1996? The AMMA Bulletin? "Damage to postal competitors" caused by what? Their internal business decisions? Employee strikes? Court rulings? Legislative activity? The competition they face from each other and the Postal Service?

Although the interrogatory claims to "note[s] specifically the PMG's reported comments about Publishers Express," the Postal Service believes that the question lacks sufficient specificity. The Postmaster General alone makes dozens of speeches, testifies before Congress at least several times, and is interviewed or otherwise provides statements either directly to the press -- or which are reported in the press -- countless times each year. As for "other" postal officials, the same is nearly true for several senior officials. In addition, dozens of other postal officials are quoted in various instruments of the national, local, or postal press too many times to count.

It would take more than one hundred work hours to interview each of these officials (Vice-President on up) and search their files and review back copies of various print publications to which the USPS Headquarters Library subscribes, review press clippings compiled by Corporate Relations, review videotape of speeches, Congressional testimony, or television news interviews or other press reports to determine who, if anybody, said anything which could be interpreted as relating to

Publishers Express or damage to postal competitors or about driving competitors out of business.

If AAPS can provide a specific citation to a press report about the statements alleged to have ben made by the Postmaster General or can provide specific information concerning any statements its believes may have ben made by specific postal officials, the Postal Service might be able to provide information responsive to this interrogatory without assuming an undue burden.

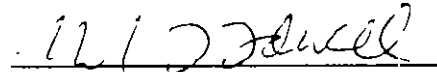
Otherwise, the Postal Service objects to responding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

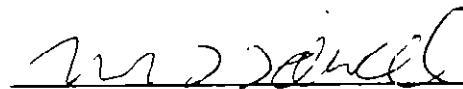
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

CERTIFICATE OF SERVICE

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



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
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September 11, 1997