

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

UNITED STATES POSTAL SERVICE OBJECTION
TO INTERROGATORY OCA/USPS-T22-12
(September 12, 1997)

Pursuant to Rules 25 and 26 of the Rules of Practice, the United States Postal Service hereby objects to interrogatory OCA/USPS-T22-12 on the grounds of privilege.

Interrogatory OCA/USPS-T22-12 asks witness Treworgy to update Worksheet C-1, *Scanning Infrastructure Capital and Program Costs*, Worksheet C-2, *Distribution Key for Volume Variable Scanning Infrastructure Capital and Program Costs*, to reflect "the \$218 million contract awarded to Lockheed Martin" in lieu of his cost estimates. Were the situation as simple as the interrogatory suggests, the update might not be that difficult to perform.

The primary difficulty in responding affirmatively to the interrogatory is that while the cost of certain scanners may have been determined in the initial contract award, other pieces of the contract are still being negotiated -- and those pieces are also implicated in updating Worksheets C-1 and C-2. Were the Postal Service to update the worksheets, it would reveal pre-decisional and commercially sensitive information that would harm its negotiation position. Other types of scanners and more memory (RAM), for example, are matters under discussion. Various discussions involve both modifications to the initial contract award and related contracts, all of which could be

impacted by updating the worksheets. Accordingly, the United States Postal Service objects to interrogatory OCA/USPS-T22-12.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

for 

Kenneth N. Hollies

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.

for 

Kenneth N. Hollies

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