

DOCKET SECTION

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 UPS/USPS-38 (September 29, 1997)

The United States Postal Service hereby objects to interrogatory UPS/USPS-38, filed on September 17, 1997. The discovery request asks that the Postal Service:

Please refer to the Revenue, Pieces and Weight (RPW) Reporting System and other systems as appropriate. Provide the Third Class Government Fiscal Year 1996 volumes, dropshipped at each BMC and ASF and SCF.

The basis for the Postal Service's objection to this interrogatory is that it seeks commercially sensitive information regarding volume data specific to particular facilities. This material would provide UPS, one of the Postal Service's most ardent competitors, with a clear depiction not only of the relative volumes of many of the Postal Service's facilities, but would also enumerate with specificity those facilities that accept the most and least destination-entered mail. Such information would be invaluable to any competitor, and its release would be exceedingly damaging to the interests of Postal Service.

The Postal Service will be filing a response to this interrogatory on October 1, 1997, that will indicate that it does not collect or maintain volume-specific destination entry volume information responsive to the discovery request made by UPS. However, given the nature of request in UPS/USPS-38, the Postal Service considers it important to make clear that it does not, by filing a response, intend to waive its

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objection to releasing volume-specific data of any kind, including that sought by this particular discovery request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorneys:

Daniel J. Foucheaux, Jr.
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Anne B. Reynolds

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.


Anne B. Reynolds

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