

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

EXPERIMENTAL PERIODICALS  
CO-PALLETIZATION DROPSHIP  
DISCOUNTS FOR HIGH EDITORIAL  
PUBLICATIONS, 2004

Docket No. MC2004-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES ABM/USPS-T1-11 and -13  
OF AMERICAN BUSINESS MEDIA  
(March 31, 2004)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories ABM/USPS-T1-11 and 13, filed by American Business Media (ABM) on March 24, 2004, on grounds of relevance and confidentiality.

Interrogatory ABM/USPS-T1-11 asks for the identity of the one printer/consolidator who provided the data for AP 9 in the first co-palletization data collection report provided under Docket No. MC2002-3. Interrogatory ABM/USPS-T1-13 asks for the identity of all printers/consolidators who were participating in the existing co-palletization program as of the end of FY 2003, and the identity of all printers/consolidators who are participating now.

The identity of mailers as well as their mail entry patterns (including volume, mail characteristics, and entry locations) have long been recognized as sensitive information in Commission proceedings. Primarily, this recognition reflects the commercial

sensitivity of the information to respective mailers, although the information can also be commercially sensitive to the Postal Service. Sometimes mail entry information can be interpreted to identify the mailer(s), or the facility in which it is entered. Such information is inherently sensitive since competitors of identified mailers, or competitors of the Postal Service, may be able to extract a competitive advantage from the information. This docket is no different from any other in these respects, where mailer and printer participants in the co-palletization experiment are competitors with one another and also with non-participating mailers and printers. Mailers expect that information about their mailings will be maintained in confidence, and that expectation is reasonable. Moreover, the ability of the Postal Service to gather and use that information for purposes beyond calculating proper postage and fees would be harmed were such mailer information routinely revealed.

The Postal Service believes that the participants would not want to be identified, especially when their data are also being reported publicly (albeit in an aggregate form). Interrogatory ABM/USPS-T1-11 is especially troublesome because the data for AP9 can be directly linked to the one printer/consolidator whose identity is requested.

The identity of the participants in the current co-palletization experiment also is not relevant to any issues in this docket. To the extent participation in the current experiment might be relevant to the proposed discounts in this docket, the Postal Service believes that such relevance would be focused on the characteristics of the participants, rather than their identity.

The Postal Service accordingly objects to interrogatories ABM/USPS-T1-11 and -  
13.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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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