

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OCA/USPS-T1-2(f)  
(April 25, 2005)

For the reasons stated below, the United States Postal Service hereby files its objection to the above-referenced interrogatory filed by the Office of the Consumer Advocate on April 14, 2005.

Interrogatory OCA/USPS-T1-2(f) asks witness Potter:

Please refer to your testimony at pages 6 and 7, line 23, and lines 1-5, respectively, concerning Registered Mail service.

- ...
- (f) To date, has the cross-functional team prepared any reports, workpapers, documents, or other materials in preparation for, or as part of, its review? If so, please provide those reports, workpapers, documents, or other materials.

The Postal Service objects to this question, to the extent that it seeks disclosure of the pre-decisional work-product of the internal cross-functional team referenced at pages 6-7 of USPS-T-1. No such work product has been generated to-date. However, any obligation to publicly disclose such materials will surely have a chilling effect on the functions of the group, by serving to discourage members from committing to paper or e-mail any candid pre-decisional recommendations, analyses, opinions, and other ideas, the circulation of which are intended to advance the team toward a swift completion of its mission.

Moreover, some of their discussions and analyses are expected to pertain to physical security measures applicable to Registered Mail processing, transportation, and delivery. Detailed public disclosure of such matters could compromise the security measures employed by the Postal Service.

Accordingly, the Postal Service objects to this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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