

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 PART OF UPS INTERROGATORY UPS/USPS-T33-59 TO WITNESS SHARKEY
AND MOTION FOR LATE ACCEPTANCE
(October 1, 1997)

The United States Postal Service hereby objects to part of interrogatory NDMS/USPS-T33-59, filed on September 17, 1997. The last sentence of this interrogatory requests provision of all studies performed by the Postal Service to determine the appropriateness of the creation of a new minimum weight level for Priority Mail. The Postal Service objects on the ground that the interrogatory requests information which is proprietary, trade secret, confidential competitive information of the Postal Service, disclosure of which, in any form, would harm significantly the legitimate business interests of the Postal Service. The Postal Service further objects that given that the Postal Service does not propose a change in the minimum weight level for Priority Mail in this case, the interrogatory is not sufficiently relevant to warrant production.

Given the heavy volume of discovery currently directed toward Postal Service witnesses, the initial investigation into draft answers of this interrogatory was not completed in such a time as to reveal the sensitive nature of the information possessed by the Postal Service by the due date for objections. For this reason, the Postal Service has no option but to file its objections today, and request that an extension of time be granted for their filing. The Postal Service has faxed its objections directly to UPS

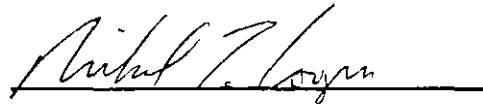
counsel, and believes that under this procedure, no party will be harmed by the short delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

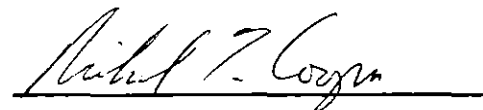


Richard T. Cooper

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October 1, 1997

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.



Richard T. Cooper

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