

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
DOUGLAS F. CARLSON INTERROGATORY TO
UNITED STATES POSTAL SERVICE WITNESS JOSEPH E. NASH
(DFC/USPS-T16-6)
(August 7, 2006)

The United States Postal Service hereby objects to interrogatory DFC/USPS-T16-6, filed by Douglas F. Carlson on July 28, 2006. The interrogatory is reprinted below, and is followed by the bases for these objections:

DFC/USPS-T16-6. Please refer to your response to DFC/USPS-T16-5. Please provide the file '&MPATH.RTE_FDX.CSV'.

The Postal Service objects to this interrogatory on the bases of relevance, security, and commercial sensitivity.

The requested file -- '&MPATH.RTE_FDX.CSV' -- is a file that maps every 3-digit zip code to a FedEx airstops. The contents of this file are irrelevant to any of the issues in this omnibus rate case proceeding. In his testimony, Witness Nash merely mentioned the connection between SCFs and FedEx air facilities in his discussion of distributing certain ground miles to Zones 5-8 because those ground miles are incurred in transporting mail to and from air facilities for a journey that results in Zones 5-8. The actual connections, themselves, are not related to his testimony.

More importantly, for security reasons, the Postal Service does not disclose this type of information -- concerning specific routes where planes carry large parcels. Moreover, the Postal Service considers the information to be proprietary and commercially sensitive. In addition, this information is considered confidential under the

FedEx Transportation agreement. See Docket No. R2001-1, USPS-LR-J-97, p. 31 (Art. 17).

For all of the reasons discussed above, the Postal Service objects to interrogatories DFC/USPS-T16-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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.

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