

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
DOCKET NO. R97-1

OBJECTION OF UNITED PARCEL SERVICE
TO PARCEL SHIPPERS ASSOCIATION
INTERROGATORIES PSA/UPS-4, PSA/UPS-5,
AND PSA/UPS-6(b)-(e)

(February 9, 1998)

United Parcel Service hereby objects to Parcel Shippers Association interrogatories PSA/UPS-4, PSA/UPS-5, and PSA/UPS-6(b)-(e), on the grounds stated herein.

Interrogatory PSA/UPS-4 requests "an estimate of the number of parcels handled by United Parcel Service, in the most recent period for which such data are available, that were in excess of 70 pounds and also how many were in excess of 108 inches in length and girth combined." This information is not relevant to the establishment of proper postal rates in this proceeding, nor could it possibly lead to the discovery of admissible evidence. In particular, since the Postal Service's weight limitation is 70 pounds, the volume of UPS parcels that weigh in excess of 70 pounds has no bearing on any issue in this case. Information on the number of UPS parcels

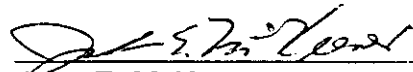
that exceed 108 inches in length and girth combined is not routinely compiled by UPS, and it would be unduly burdensome if not impossible to calculate. Moreover, the composition of UPS's volume by weight and size is confidential information.

Interrogatory PSA/UPS-5 requests, for the past five years, the "volumes, the revenue, the costs attributable to and the net income realized from [UPS's] domestic, non-expedited transportation of parcels." Again, the requested information is not relevant to the establishment of proper postal rates, nor is it reasonably calculated to lead to the discovery of admissible evidence in this proceeding, which involves the Postal Service's costs and revenues, not those of UPS. Moreover, it would be unduly burdensome to respond to this interrogatory, especially since some of the requested information could be obtained only by conducting a special study. Finally, the requested information is confidential.

Interrogatories PSA/UPS-6(b)-(e) request the "gross percentage" of parcels which receive a discount, the "gross percentage" which pays a surcharge, and the "average" discount and surcharge. Once again, this information is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, even assuming the information had some tangential relevance -- and it does not -- producing

it would require a special study and thereby impose an undue burden on UPS. The requested information is also highly confidential commercial information.

Respectfully submitted,



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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 Commission's Rules of Practice.



John E. McKeever

Dated: February 9, 1998
Philadelphia, PA