

ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-62-66)
(March 8, 1999)

The United States Postal Service hereby objects to interrogatories OCA/USPS-62 through 66, filed March 1, 18, 1999 on the grounds of timeliness, due process, burden, cumulative nature, lack of foundation, and relevance. Moreover, most of the interrogatories stem from inappropriate and incorrect assumptions regarding the Postal Service's direct case, and responding to the totality of what the OCA seeks would risk delay in the procedural schedule by two or more months.

This set of interrogatories simply attempts to re-plough ground covered by previous OCA interrogatories and USPS objections. Accordingly, the grounds for this objection are already set forth in the USPS objection filed on February 25, 1999, and are not repeated herein.^{1/}

WHEREFORE, the United States Postal Service objects to interrogatories OCA/USPS-62-66.

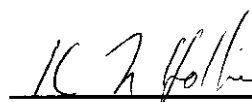
^{1/} Moreover, the Postal Service has been directed to respond to the OCA's March 4, 1999 Motion to Compel by noon on March 10, 1999.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

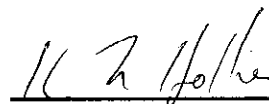
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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.



Kenneth N. Hollies

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March 8, 1999