

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

Docket No. C99-1

**UNITED STATES POSTAL SERVICE
OBJECTION TO UNITED PARCEL SERVICE
INTERROGATORIES UPS/USPS—44-45
(July 12, 1999)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories UPS/USPS—44-45, filed on June 30, 1999.

Interrogatory *UPS/USPS-44*. Interrogatory 44 requests that the Postal Service state the percentage of transactions that are sent by USPS test participants to a "foreign top level domain." The Postal Service objects on grounds of vagueness, burden, and relevance. First, the interrogatory does not define the term "foreign top level domain." Thus, the Postal Service is left to guess what the definitive list of foreign top level domains would include. Even assuming that a definitive list of foreign top level domains were provided, a subset of all Post E.C.S. messages sent by test participants to recipients could not be identified without undue burden. In particular, there is no mechanism that would facilitate automated searches of recipient e-mail addresses. As such, preparing a response to this interrogatory would require that computer programmers obtain **raw** data files from two computer systems. Each recipient e-mail address would appear in the raw data files proximate to other extraneous characters and there would be no obvious visual separations between e-mail addresses and other

information. Consequently, the data would have to be converted manually, upon visual inspection, to a format that would tend itself to searching for foreign top level domains. Each of thousands of recipient e-mail addresses would then have to be independently examined to determine whether it incorporates a foreign top level domain in the address. The Postal Service estimates that this task would require at least 21 person days of time to prepare a response. This would be unduly burdensome, particularly given the lack of relevance of this information to the matters at issue in this proceeding. Finally, the fact that an e-mail address contains a "foreign top level domain" does not prove that any particular transaction is foreign or domestic.

Interrogatory UPS/USPS-45. Interrogatory 45 requests that the Postal Service identify the proportion of licensed users that have a "foreign top level domain" in their e-mail addresses and describe its internal practices if it receives an application from a potential user having an e-mail address with a foreign top level domain. The Postal Service objects on grounds of vagueness, relevance, and commercial sensitivity (in part). First, as discussed above, the interrogatory does not define the term "foreign top level domain." Even assuming that a definitive list of foreign top level domains were provided, the response to these questions would not shed light on the functional characteristics of the service. Finally, to the extent this question seeks information on the Postal Service's understandings or arrangements with foreign posts, the Postal Service objects on grounds of commercial sensitivity, as the Postal Service's dealings with the foreign posts would give indications of the posts' marketing strategies to which

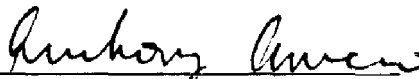
UPS, in its capacity as both a competitor of the posts and an equity investor in a supplier of the software used in Post E.C.S., should not be privy.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Anthony Alverno

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.



Anthony Alverno

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