

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE TO
UNITED STATES POSTAL SERVICE WITNESS THOMAS SCHERER (USPS-T-33)
(OCA/USPS-T33-6)
(June 26, 2006)

The United States Postal Service hereby files an objection to the following interrogatory filed by the Office of the Consumer Advocate on June 16, 2006. The interrogatory is reprinted below, and is followed by the bases for this objection:

OCA/USPS-T33-6

This interrogatory reads as follows:

OCA/USPS-T33-6. This interrogatory seeks information on the development of Priority Mail rates. Please refer to your testimony, Attachment A, Table 2 of 12, and the column "Zone 3 Share of Zones L, 1, 2 & 3." Please confirm that the "Special Weight Report from ODIS-RPW" cited as the source of the percentages in the referenced column has been provided as a library reference in this proceeding. If you do not confirm, please provide the cited "Special Weight Report from ODIS-RPW" in hardcopy and electronic form. If you do confirm, please provide the Library Reference number.

The referenced Special Weight Report has not been filed as a Library Reference in this proceeding. The Postal Service objects to making a copy available because the report contains — at the level of the rate cell — disaggregated data by piece shape and method of postage payment. Such data could be used to the Postal Service's competitive disadvantage. Therefore, the requested report is commercially sensitive and proprietary.

Accordingly, the Postal Service objects to OCA/USPS-T33-6.

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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