

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF CONSUMER ADVOCATE
[OCA/USPS-92]
(September 29, 2006)

The United States Postal Service hereby provides its response to the above-listed interrogatory of the Office of the Consumer Advocate, filed on July 14, 2006. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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OCA/USPS-92. Please see the attached “National Small Business Poll,” conducted by the National Federation of Independent Business (NFIB) and issued in 2002.

- a. Has the Postal Service conducted similar research within the last 5 years? If so, please provide it.
- b. Does the Postal Service have research and/or poll results that contradict the findings contained in the NFIB poll? If so, please submit it.
- c. Is the Postal Service familiar with the NFIB poll? If so, have the results of the poll influenced any decisions or actions of the Postal Service since the release of the poll results? If so, please describe all such decisions or actions.

RESPONSE

- (a) No.
- (b) See the response to subpart (a). The Postal Service has not attempted to replicate the 2002 NFIB poll and, therefore, has no poll results of its own that either contradict or support the NFIB poll results.
- (c) Without canvassing its managerial ranks, the Postal Service assumes the possibility that one or more of its thousands of management employees has read the publicly available NFIB poll results at some time between their issuance and the date of this interrogatory. The same assumption applies to countless other external documents generated and circulated by parties interested in postal matters. Without an exhaustive interrogation of all of its managers and a chronology and dissection of the process by which all decisions are made, it is virtually impossible for the Postal Service to determine the extent to which any one or a combination of these documents may have influenced any internal postal management policy discussion, or any decision or action by the Postal Service.