

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO CARLSON INTERROGATORIES DFC/USPS-22(e)&(g)

The Postal Service hereby objects to two interrogatories filed by Mr. Carlson on February 15, 2000, and directed to the Postal Service. These questions lack relevance to the issues in this proceeding.

DFC/USPS-22(e)

This interrogatory asks the Postal Service to "describe the EXFC performance goals that affect postal managers' compensation and the extent to which each goal affects their compensation."<sup>1</sup> Presumably, Mr. Carlson is seeking to establish a foundation for arguing that the Commission should discount EXFC scores in determining the value of service for First-Class Mail under § 3622(b)(2). Assuming generally affirmative responses to parts (d) and (f), he will have a foundation for doing so. The explicit details of the manner in which EXFC scores are a factor in compensation for various levels of postal management is not material to his argument or to any issue in this case.

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<sup>1</sup> This question follows part (d), which asks the Postal Service to "confirm that a portion of the compensation that postal managers receive is dependent upon meeting certain EXFC performance goals." It precedes part (f), which asks the Postal Service to "confirm that it has experienced problems with postal managers taking steps to increase EXFC scores . . . that are inconsistent with . . . policy directives." The Postal Service has elected not to object to answering parts (d) or (f).

DFC/USPS-22(a)

This question asks the Postal Service to "explain the appropriate response if the Postal Service learns, by customer input, audit, or other means, that a postal manager is not upholding national service standards prescribed in postal manuals or described in policy directives." The question seeks information which has no bearing on any issues related to postal ratemaking. Instead, it seeks to explore matters related to postal personnel disciplinary action. The discovery process in a postal rate case is not a proper venue for exploration of such issues.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Michael T. Tidwell

**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.



Michael T. Tidwell

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