

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

MOTION OF UNITED PARCEL SERVICE TO COMPEL
PRODUCTION OF INFORMATION AND DOCUMENTS
REQUESTED IN INTERROGATORY
UPS/USPS-T34-11 TO WITNESS ROBINSON
(March 13, 2000)

Pursuant to Sections 26(d) and 27(d) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby moves the Presiding Officer to order the United States Postal Service ("Postal Service") to answer interrogatory UPS/USPS-T34-11, filed on February 16, 2000, and to produce the documents requested therein. A copy of this interrogatory is attached hereto as Exhibit A. The Postal Service filed an objection to the interrogatory on February 28, 2000 ("Objection").

UPS submits that the requested information is highly relevant to the determination of an appropriate cost coverage for Priority Mail, and can be provided without undue burden and without injury to the Postal Service's legitimate interests.

THE DISCOVERY REQUEST

Interrogatory UPS/USPS-T34-11 requests the Postal Service to identify all systems for measuring the service performance of Priority Mail, provide "manuals, guidelines, directives, or other documents which indicate how measurements are made and how the system operates," and provide "all results for all such systems for each

year (by quarter, if available) from FY1990 through FY1999, and up to the present.” On February 28, 2000, the Postal Service objected to this interrogatory on the grounds that it is overbroad, that it “would require a burdensome review and collection” of manuals describing the system, and that the information includes “proprietary, confidential, commercially sensitive, geographically-specific performance data.” Objection, at 1-2.

ARGUMENT

As we show below, the Postal Service’s objections are without merit. Nevertheless, in an effort to narrow the scope of this discovery dispute, UPS is willing to limit its request to (1) ***national*** service performance results (*i.e.*, excluding “geographically-specific” results) and (ii) the period from FY1993 to FY1999 (by quarter, if available). Given the importance of actual service performance data in evaluating value of service considerations, the Postal Service should be ordered to produce this information.

1. The Interrogatory, Especially as Modified Herein, Is not Overbroad.

The Postal Service asserts that UPS’s request for data on the actual service performance of Priority Mail is overbroad “insofar as it requests performance information for years prior to the years at issue in this case. . . .” Objection, at 1. As stated above, UPS is willing to limit its request to quarterly data for the period FY1993 (as opposed to FY1990, as specified in the original request) through FY1999.

Data prior to the base year in this case is required if the Commission and the parties are to be able to compare Priority Mail’s current performance -- one aspect of value of service -- to its performance leading up to the Commission’s decision in Docket

No. R97-1, where the Commission cut Priority Mail's cost coverage from 197% -- the level set in Docket No. R94-1 -- to 166%. Docket No. R97-1, Opinion and Recommended Decision, App. G, at 32 (Revised 6/19/98). The Commission's action was based in part on the view that one witness' "analysis of delivery performance suggests that Priority Mail often fails to provide a standard of service superior to, or at times even equal to, that of First-Class Mail." *Id.* at 363. Clearly, then, a history of Priority Mail's actual performance from FY1993 (the base year in Docket No. R94-1) to FY1996 (the base year in Docket No. R97-1), and from FY1996 through the most recent year, is highly relevant to the determination of an appropriate cost coverage for Priority Mail in this case.

Accordingly, UPS's modified request for data covering FY1993 through FY1999 is not "overbroad," and the Postal Service should be ordered to respond.

2. The Requested Information Can Be Provided Without Undue Burden.

The Postal Service asserts that to produce copies of the manuals or other documents that describe how Priority Mail performance is measured would be "burdensome." Objection, at 1. The Postal Service does not "state with particularity the effort which would be required to answer the request, [or] provide[] estimates of cost and work hours required," as is required in the case of an undue burden objection. Rules of Practice, Rule 26(c), 39 C.F.R. § 3001.27(c). That is undoubtedly because the cost and work hours involved in locating and copying a manual (or possibly manuals) on how the measurements are made is minimal.

The Postal Service's undue burden objection is nothing more than a frivolous red herring. It is unlikely that the Postal Service has such a plethora of systems for

measuring Priority Mail performance that providing the manuals for each system would be an undue burden. This interrogatory does not require the Postal Service to perform any new calculations. It merely asks the Postal Service to collect information that is already available. The Postal Service should be ordered to do so.

3. Priority Mail Service Performance Information Is Not, and Should Not Be, Confidential.

Finally, the Postal Service objects that the requested information is confidential. This objection apparently refers only to “geographically-specific” performance information (although the Postal Service has not responded to the extent it deems the interrogatory to be proper, see Rule 26(c) (“If objection is made to a part of an interrogatory, that part shall be specified”), but rather has objected to the interrogatory in its entirety). Objection, at 1.

The Postal Service’s confidentiality claim is mystifying. The Postal Service apparently publicizes on a regular basis PETE information on Priority Mail performance. See Exhibit B (copies of Postal Service newsletters).¹ The newsletters attached hereto as Exhibit B were available free to the public in the lobby of the Postal Service’s Washington, D.C., headquarters. Each contains “geographically-specific” Priority Mail performance information. See, e.g., Exhibit B, 3 Rocky Mountain Summit No. 8, at 1 (for the Colorado/Wyoming Performance Cluster, containing PETE Combined, Overnight, and 2-day performance data); 3 Long Island Dispatch No. 3, at 1 (for the

1. PETE stands for Priority End-to-End Measurement System. See response to interrogatory DFC/USPS-49 (inadvertently marked as DFC/USPS-T34-49) (March 2, 2000) (“Carlson 49”).

Long Island Performance Cluster, containing PETE "1-2 day" performance data for Long Island, NY Metro Area, and National); Triboro Voice No. 22, at 1 (for the Triboro Performance Cluster, containing PETE "Composite" performance data for Triboro, NY Metro Area, and National); 2 Fort Worth News No. 12, at 1 (for the Fort Worth Performance Cluster, containing PETE "2 days" performance data), all dated August 1999. See also response to interrogatory Carlson 49, in which the Postal Service provides a copy of a brochure entitled, "PETE Priority End-to-End Measurement System." The Postal Service has also provided without objection Priority Mail performance information derived from the ODIS system. See Response to Interrogatory DFC/USPS-T34-8 (February 25, 2000).

The Postal Service also refers to PETE data in its communications to the general public. See, e.g., Comprehensive Statement on Postal Operations 1998, at 48 ("Service performance, as measured by Priority End to End (PETE), consistently shows a higher percent of intra-Priority Network volume is delivered to our customers within two days when compared with the national rate, excluding all Priority Mail Network volume.") These publications of Priority Mail performance information by the Postal Service demonstrate that the Postal Service's confidentiality claim is spurious.

Even if geographically-specific actual performance data were deemed to be confidential, the Postal Service's public distribution of such data constitutes a waiver of any claim of confidentiality. Indeed, the Postal Service answered similar questions posed by Mr. Carlson. See responses to interrogatories DFC/USPS-T34-8 (February 25, 2000) and to Carlson 49. The Postal Service apparently has a double-standard approach which leads it to take inconsistent positions with respect to different

intervenors -- here, Mr. Carlson on the one hand, and UPS on the other. All intervenors, competitors and mailers alike, stand on the same footing in a rate case. The bottom line is that no matter who asks for the information, it either is confidential, or it is not.

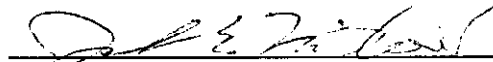
Finally, it is curious for the Postal Service to take the position that data it already has on the performance of a service that it sells to the public is no business of the public.

As we have shown, the Postal Service does not treat as confidential "geographically-specific" Priority Mail actual performance information. Nevertheless, UPS is willing to forego "geographically-specific" data and to accept solely national performance data for the period requested.

WHEREFORE, United Parcel Service respectfully requests that the Postal Service's objections to interrogatory UPS/USPS-T34-11 to Postal Service witness

Robinson be overruled, and that the Postal Service be ordered to produce the information and documents requested in that interrogatory, as modified herein.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)
and
1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

BEFORE THE
POSTAL RATE COMMISSION

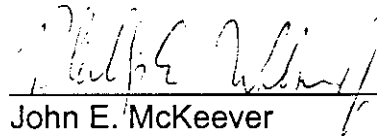
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS FROM UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS ROBINSON
(UPS/USPS-T34-11 and 12)
(February 16, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to United States Postal Service witness Robinson: UPS/USPS-T34-11 and 12.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)
and
1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

UPS/USPS-T34-11. (a) Does the Postal Service have a system or systems for measuring the actual service performance of Priority Mail, whether that performance is measured in terms of actual days to delivery, extent to which actual performance meets service standards, time-in-transit, time from collection to delivery, or any other measure? If so, identify all such systems, provide descriptions of them (including any manuals, guidelines, directives, or other documents which indicate how measurements are made and how the system operates), and provide all results for all such systems for each year (by quarter, if available) from FY 1990 through FY 1999, and up to the present.

(b) Please identify and describe the Postal Service system known as, or as identified by the acronym of, PETE.

UPS/USPS-T34-12. Refer to Attachment A, which is the Compensation attachment to Contract Postal Unit Contract No. 363199-99-U-0158, relating to a two-year contract beginning on November 7, 1998, to operate a Contract Postal Unit ("CPU") for the Postal Service. The Compensation attachment states that the CPU operator "will be paid 20% of the postal funds it receives and remits for the sale of domestic Priority Mail and domestic Express Mail," and "5% of the postal funds it receives and remits for the sale of all other postal products and services" that are subject to the contract.

(a) Are the full amounts paid by the Postal Service to the CPU operator under such contracts for the sale of Priority Mail attributed solely to Priority

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

Mail? If so, indicate how and where this attribution is reflected in the Postal Service's presentation in this proceeding.

(b) Are the full amounts paid by the Postal Service to the CPU operator under such contracts for the sale of Express Mail attributed solely to Express Mail? If so, indicate how and where this attribution is reflected in the Postal Service's presentation in this proceeding.

(c) In what cost segment and component are the payments made by the Postal Service to CPU operators under such contracts recorded in the case of Priority Mail? Identify all accounts in which such payments on account of Priority Mail are recorded.

(d) In what cost segment and component are the payments made by the Postal Service to CPU operators under such contracts recorded in the case of Express Mail? Identify all accounts in which such payments on account of Express Mail are recorded.

(e) In what cost segment and component are the payments made by the Postal Service to the CPU operators under such contracts recorded in the case of other postal products? Identify all accounts in which such payments on account of other postal products are recorded.

(f) Provide separately for BY 1998 and FY 1999 the total amount of payments made by the Postal Service under such contracts for the sale of Priority Mail.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

(g) Provide separately for FY 2000 and for the Test Year the Postal Service's estimates of the total payments it will make under such contracts for the sale of Priority Mail.

(h) Provide separately for BY 1998 and FY 1999 the total amount of payments made by the Postal Service for such contracts for the sale of Express Mail.

(i) Provide separately for FY 2000 and for the Test Year the Postal Service's estimates of the total payments it will make under such contracts for the sale of Express Mail.

(j) Provide separately for BY 1998 and FY 1999 the total amount of payments made by the Postal Service under such contracts for the sale of all other postal products.

(k) Provide separately for FY 2000 and for the Test Year the Postal Service's estimates of the total payments it will make under these contracts for the sale of all other postal products.

(l) How many such contracts with a "Performance Payment Rate" structure (see the attachment) that is the same as or similar to that reflected in the attachment (*i.e.*, where payments are made to the CPU operator on the basis of a stated percentage of the funds received for the sale of Priority Mail and/or Express Mail at a rate higher than for other postal products) are currently in effect?

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

(m) Provide the total amount paid by the Postal Service under all such contracts since the inception of this program up to the present, separately for Priority Mail and for Express Mail.

ATTACHMENT 4 - COMPENSATION

CONTRACT STATION/CONTRACT BRANCH/COMMUNITY POST OFFICE

The supplier agrees to operate a CONTRACT POSTAL UNIT and will receive performance based payments as set out below:

Performance payments will be made in arrears, by the St. Louis Accounting Service Center within 21 days after the end of each Postal Accounting Period (a twenty-eight day period beginning on a Saturday and ending on a Friday comprising two designated two-week postal pay periods) except that payment for Accounting Period 13 shall be made within 28 days after its end.

Performance Payment Rate

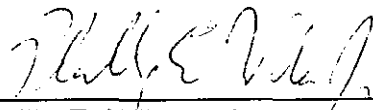
Performance Payment rates are as follows:

The Supplier will be paid 20% of the postal funds it receives and remits for the sale of domestic Priority Mail and domestic Express Mail.

The Supplier will be paid 5% of the postal funds it receives and remits for the sale of all other postal products and services that are checked in Section II of Attachment 1.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: February 16, 2000
Philadelphia, Pa.

59340

Rocky Mountain Summit

August 1999

Colorado/Wyoming Performance Cluster

Vol 3 No 8

HERE'S HOW WE'RE DOING!

AP 11 Performance Cluster Stats

SERVICE QUARTERS 3 & 4

	Actual	SPLY	Goal
EXFC			
Overnight	94.14	90.34	93.00
2/3 Day	85.77	81.00	85.60
PETE			
Combined	85.71	79.04	88.20
Overnight	91.49	81.50	92.00
2-Day	83.40	77.50	—
DEL/CONF	94.14	N/A	100.00

SAFETY YEAR TO DATE

TOTAL ACCIDENT FREQUENCY	Actual	SPLY	Goal
	13.26	11.75	11.50

LOST WORKDAY FREQUENCY	Actual	SPLY	Goal
	1.72	1.96	1.85

MOTOR VEHICLE FREQUENCY	Actual	SPLY	Goal
	13.82	11.43	11.50

BUDGET YEAR TO DATE OVERTIME

	Actual	SPLY	Goal
Mail Proof/MH	7.78	14.38	8.50
Cust Serv/MH	8.86	10.32	8.50
City Carriers	11.54	13.96	8.50
Family	0.55	1.04	0.40

TOTAL WORKHOURS RATIO	% to Plan	Goal
	0.0	0.0

ATTENDANCE	Actual	SPLY	Goal
Sick leave	3.60	3.45	3.35
Incidental SL	1.93	1.88	2.25

Western Area Scores (QTD)

	EXFC	O/N	2/3
Alaska (2-day)	—	—	84.6
Albuquerque	94.0	84.0	—
Arizona	92.6	84.7	—
Big Sky	94.8	83.7	—
CO/WY	94.1	85.8	—
Las Vegas	93.2	86.8	—
Portland	93.3	84.0	—
Salt Lake City	94.0	86.8	—
Seattle	92.9	81.8	—
Spokane	94.2	79.2	—

EXFC — External First-Class Measurement
 PETE — Priority End-to-End Measurement
 DEL/CONF — Delivery Confirmation
 AP — Accounting Period
 QTD — Quarter-to-Date
 YTD — Year-to-Date
 SPLY — Same Period Last Year

INSIDE

Honoring Those
 Who Served.....6

Entries mount as performance climbs

Goals! Goals! Goals! You've heard a lot about them. They give you direction, provide benchmarks to measure achievement, and let you know how you're doing. When people and organizations have well-defined goals, great things can happen.

When Lance Armstrong set out to win the Tour de France against the greatest of odds — defeating testicular cancer and the side effects of grueling treatments — to say it was an uphill battle would be an understatement. His triumph in the premier race of cycling is a tribute to his inner strength and his ability to make his goal a reality.

The Colorado/Wyoming Performance Cluster (PC) was near the bottom of the barrel last year in many of its service scores. Some may even have wondered if the PC would ever be able to turn it around. But it has! All you need to do is glance at the stats listed in the box to the left to see the tremendous improvement the PC has made in the area of service as compared to the same period last year (SPLY).

Overnight External First-Class Measurement (EXFC) is over goal and nearly three percentage points above SPLY. EXFC for two- and three-day delivery areas is over goal and nearly five percentage points over SPLY.

Priority End-to-End (PETE) on-time delivery performance has greatly improved over SPLY, and there is still a possibility that goal will be reached in the overnight and combined scores.

These scores rank us near the top in the Western Area and in the top third in the nation. This performance is clearly an achievement for which all in the CO/WY PC can be proud.



Marketing Manager Steve Green is up to his neck in goals entries — to completely bury him, send in the final game below by Sept 10.

Is there room for improvement? Yes! Does reaching for your goals make a difference? You bet! So, once again here are those goals!

- Improve Customer Satisfaction
- Improve Financial Performance
- Improve Employee Workplace Environment

Don't miss your last chance to enter grand prize drawing

You don't have to leave this page to find the answers to this goals puzzle. Locate the 12 underlined words in the story above, circle those same words in the puzzle. Send in your answers along with the completed entry form by Sept 10.

Y N M W O T U N A T R F
 E R A A G N I L C Y C Y
 T C E T R O A K E U D R
 R A N R I M O R C A R E
 U C I A T O S E I R E V
 O A Y T R S N T V L V I
 T A U H O F S C R N O L
 E R E A C H E D E O P E
 N T E C Y C L E S R N D
 E V O R P M I O V D G G
 T N E M E V E I H C A A
 P G A R M S T N G A L C

Name _____

Home address _____

City, State, ZIP+4 _____

Work location and daytime phone number _____

Social security number _____

Please answer the following questions, yes or no:

Do you know your goals? _____

Have you been told how your unit is doing? _____

Mail this completed form and puzzle to:
 GOALS — SEPTEMBER DRAWING
 7500 E 53RD PL RM 1122
 DENVER CO 80266-9996

Please ensure that your address is complete.
 Entry must be received by Sept. 10. Only
 original puzzles will be accepted; no photocopies
 allowed. One entry per CO/WY PC employee.

Yes! I know my goals!

LONG ISLAND DISPATCH

AUGUST 1999

for LONG ISLAND PERFORMANCE CLUSTER EMPLOYEES

Vol. 3 No. 3

GOLF CLASSIC

Letter carrier's tourney benefits Leukemia Society

All employees are invited to participate in the first annual VCF Golf Classic at Medford's Mill Pond Golf Club on Oct. 1.

Organized by Valley Stream Letter Carrier Glenn Fezza to honor his father, a retired NYC policeman who lost his fight to leukemia this past year, the tournament's proceeds will benefit the Leukemia Society of America.

The Golf Package is \$125, while a dinner-only package is \$35. Checks, payable to VCF Golf Classic, should be sent by Sept. 15 to: VCF Golf Classic, c/o Glenn R. Fezza, 1333 Larboard Court, Uniondale NY 11553. For more information, call 483-5081.

"Please help us make this a successful and enjoyable event," Fezza says.

KEY NUMBERS

Performance Cluster Stats Quarter 4 through July 30

EXFC	Overnight	Goal
Long Island	92.72	93.0
NY Metro Area	92.28	92.0
National	93.09	92.0

EXFC	2-3 Day	Goal
Long Island	89.75	88.9
NY Metro Area	89.71	86.9
National	87.17	85.0

PETE	1-2 Day	Goal
Long Island	89.97	88.8
NY Metro Area	89.95	86.8
National	85.38	85.0

EASE OF USE (AP 11)

	Residential	Goal
Long Island	668	664

DELIVERY CONFIRMATION (AP 11)

	Actual	Goal
Long Island	95.1	100

SAFETY (YTD through 7/30)

	Actual	Goal
Lost Workdays	2.09	1.95
(Frequency rate per 200,000 workhours)		
Motor Vehicle Accidents	10.61	11.13
(Frequency rate per 1,000,000 miles)		

District's speed goes beyond the mail

The U.S. Postal Service's reputation for speed has grown over the past few years with improved delivery performance. But now when Long Island corporations think of the Postal Service, they have another reason to equate us with speed - our stellar performance in the 3.5-mile Chase Corporate Challenge.

The Postal Service's men's and women's teams each finished impressively - third out of 290 competing companies.



Runner tries to beat the 90-degree heat.

Postal runner John Delmaestro's blistering pace (19:13) placed him fifth out of 9,000 individual runners. The leading postal woman was not far behind: Tractor Trailer Operator Jeanette Hoff posted a time of 24:27.

Coordinated by Mid-Island ET Rich Ripke and Syosset's Postmaster Jack Ferraro and VOMA Mike Fisher, the postal team fielded 110 runners - an increase of 40 participants over last year. With tireless support from Syosset's Norman Dorf, and Mid-Island's John Weider and Allison



Some of the Postal Service participants rally before the race.

Scheno, the Postal Service team hopes to grow to become the largest of all participating companies.

"This was not only a 3.5-mile race, this was a gathering of all crafts running together in unity, a place to meet employees and their families from all over Long Island," said Woodmere Supervisor James Casella.

"This is just our third year participating. Give us a few more years and all you will see is the Postal Eagle," Ripke added.

P&DCs' drive raises nearly \$15K for ACS

Mid-Island/Western Nassau's annual Combined Federal Campaign (CFC) drive to benefit the American Cancer Society (ACS) brought in close to \$15,000 for the second consecutive year. The total for the last three years is \$37,000 to help fund a myriad of worthwhile ACS programs.

Senior Plant Manager Timothy C. Healy presented the check to Gary Burd,

executive vice president, ACS Long Island division, at a June 22 gathering of drive organizers.

"I want to thank you all for the fantastic job you did with the cancer drive this year. It was another fine year for us and you're the ones who made it happen," Healy said. "In the last month, three of our employees were diagnosed with cancer... All the people we help with this

money will appreciate your efforts."

"Nobody wants to hear the words 'You have cancer,' but if you hear those words early enough... that's what saves lives today," Burd said. "Early detection leads to early treatment."

Healy added: "This effort couldn't have been possible without the work of all the volunteers who continue to support the CFC efforts in both our plants - the leaders in CFC efforts among all federal agencies here on Long Island.

"The dedication and commitment that postal employees have shown in serving the people of Long Island go far beyond just processing and delivering the mail, as demonstrated by this recent campaign," he said.

LI District gears up for this year's Combined Federal Campaign

This year's Combined Federal Campaign will be getting underway in September.

"We look for the continued support of all employees so we can help those less fortunate than ourselves," Healy said.



Surrounded by drive organizers, Sr. Plant Manager Timothy C. Healy presents check to American Cancer Society VP Gary Burd at Mid-Island June 22.

INSIDE

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TRIBORO VOICE

AUGUST, 1999

for TRIBORO PERFORMANCE CLUSTER EMPLOYEES

ISSUE NUMBER 22

DOG BITE PREVENTION!

The Brooklyn Post Office has announced a Dog Bite Prevention Campaign. Averages of 10 to 20 children die each year from dog bite-related injuries. Other members of the community, including senior citizens and delivery service people, also are at risk. Of the estimated 4.7 million victims, more than 60 percent are small children. Letter carriers represent less than one half of one percent of all reported dog bite victims. For each letter carrier bitten, 900 children needlessly suffer the trauma of a bite.

The Postal Service, the Humane Society of the United States, The Center for Animal Care and Control, The Independent Insurance Agents of America and the ASPCA are kicking-off a Dog Bite Prevention Campaign to promote responsible pet-ownership. Last year Brooklyn was 5th in the nation in such attacks.

The kick-off will be held at the **Ryder Station Post Office, Carrier Annex on 1739 East 45th Street, Wednesday, August 11th at 10:30 am.** A full report on this important community outreach event will be in the next Triboro Voice.

STATS: PQ4, A/P11 & PQ3

<u>EXFC</u>	<u>Overnight</u>	<u>PQ3</u>	<u>Goal</u>
<i>Triboro</i>	<i>93.51*</i>	<i>93.53*</i>	93.00
Brooklyn	<i>93.55*</i>	<i>93.92*</i>	93.00
Queens	<i>93.48*</i>	<i>94.53*</i>	93.00
NY Metro Area	92.31	92.01	93.00
National	<i>93.13*</i>	92.92	93.00
<u>EXFC</u>	<u>2/3 Day</u>	<u>PQ3</u>	<u>Goal</u>
<i>Triboro</i>	<i>89.32*</i>	<i>92.25*</i>	88.90
NY Metro Area	<i>89.42*</i>	<i>90.16*</i>	85.00
National	<i>87.04*</i>	<i>86.88*</i>	85.00
<u>PETE</u>	<u>Composite</u>	<u>PQ3</u>	<u>Goal</u>
<i>Triboro</i>	88.18	82.35	88.80
NY Metro Area	<i>90.13*</i>	<i>86.28*</i>	85.00
National	<i>85.48*</i>	81.72	85.00
<u>EASE OF USE: Actual</u>	<u>PQ3</u>	<u>Goal</u>	
<i>Triboro</i> (Composite)	591	<i>598*</i>	593
<i>Triboro</i> (Residential)	<i>521*</i>	516	519
NY Metro Area(C)	<i>650*</i>	<i>642*</i>	628
<u>SAFETY</u>	<u>Actual</u>	<u>SPLY</u>	<u>Freq/Rate</u>
Accident Total	1212	1201	N/A
Lost Workday	252	343	2.84
Motor Vehicle	234	191	20.29

* denotes Goal made. N/A=not available.

'Aquarium fish' unveiled at NY Aquarium!

On Thursday, July 1st, the Triboro District unveiled the gorgeous 'Aquarium Fish' stamps at the NY Aquarium at Coney Island, Brooklyn. The location was a natural as the fish and coral reefs depicted on the stamps are also on display at the Aquarium. There were also majestic Beluga Whales, fierce sharks, adorable penguins, manta rays, giant turtles and many more marine animals that formed a wonderful backdrop to this interesting and fun event.

A little rain and humidity did not interfere with a great day as postal officials, and local community and political leaders joined with the NY Aquarium staff to unveil these beautiful stamps.

Brooklyn Postmaster, Joseph Lubrano, welcomed everyone to the event and spoke about the importance of conservation, recycling, reusable resources and protecting the planet.



'Aquarium fish' stamp unveiling (l-r): Assemblyman Howard Lasher; Triboro District Manager Lily L. Jung; Assemblywoman Adele Cohen; Aquarium Director Lou Garibaldi and Brooklyn Postmaster Joseph Lubrano.

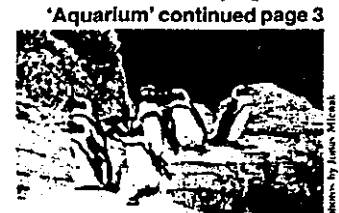
Triboro District Manager Lily L. Jung said, "All who leave here today will leave with a greater awareness of marine animals and their importance. Wildlife conservation is an important aspect of today's event and it is good to see that we have the children involved."

There were wonderful performances by the children of the

Maureen Bakke Irish School of Dance, Coney Island Child Care Center and Brownsville Child Care. All the kids had a great time.

Aquarium Director Lou Garibaldi said, "The Aquarium celebrates the world of water and we hope people understand and appreciate how important it is for us to preserve space habitats for animals to live in."

Assemblywoman Adele Cohen, who represents the



Penguins keep cool in summer heat.

Letter Carrier rescues tot!

by Blanca Garcia

Tuesday, March 29th seemed to be an ordinary spring sunny day for us, but thanks to Jose Petit it is now a blessed day to remember. Around noon time, my friend's daughter (4 years old) whom I babysit got locked in on the first floor apartment in the house where I live in Woodhaven. Not knowing what to do and not having anyone else in the house or on my block to ask for help, I approached our mailman, Jose Petit of Jamaica's Woodhaven Station. He immediately came to our rescue.

Petit first talked to the little girl to calm her down, saying: "Everything is all right, we are going to get the door opened." The only option to get in the apartment was to enter through the window, and he did. After the distress, we were calm again when the door was opened. Mr. Petit is a hero and we are forever thankful to him.

Our neighborhood needs more people like Mr. Petit. More than a dedicated mailman, he has demonstrated to be a good samaritan. He deserves a medal for what he did and we commend it.

[Garcia's letter to Manager, Woodhaven Station.]



Woodhaven Carrier Jose Petit.

African-American Women on Tour



At the Postal Service booth (l-r): BSN Rep. Yvette Turner; CSR Rep. Angela O'Neal; CS Supv. Carlet Briggs; CS Supv. Pelrique Price; GPO Window Clerk Susan McKenzie.

by Yvette Turner

The place to be on July 9-11, was the Brooklyn Marriott as the Triboro District participated in the annual African American Women on Tour (AAWOT) Conference.

The conference provides a forum for uplifting, empowering and enhancing the quality of life for African American women, their families and communities through economic, intellectual and spiritual development. In its ninth year, the nation's foremost Black women's empowerment conference incorporates the relaxation of a retreat with the informative seminars generally found at national conventions, and brings them together in an environment which celebrates culture and womanhood. Guest speakers included Attallah Shabazz, social activist; Bev Smith, radio personality; and Dr. Jocelyn Elders, former US Surgeon General.

The U.S. Postal Service has a proud legacy of commitment, being of service to all communities and is excited to be a returning sponsor of this event. Continued on page 3

Brooklyn Drivers:
'The Nation's Best!' 2

Celebrating: 'Woman's
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Far Rockaway Post Office
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FORT WORTH NEWS

AUGUST, 1999

for FORT WORTH PERFORMANCE CLUSTER EMPLOYEES

Vol. 2 No.12

GOALS

VOE - Voice of the Employee

Strengthen Employee/USPS Effectiveness

Subgoals	Targets
Recognize good performance	90%
Deal with poor performance	97%
Ensure safe work environment	100%
Indicators	Targets
Goal knowledge	90%
EAS 14/below (8 hrs. training.)	97%
EAS 15/above (20 hrs. training.)	97%
Craft employees (8 hrs. training.)	100%
Lost Workday Injuries	below 132 (1.54 per 100 employees)
Vehicle Accidents	below 248 (7.57 per million miles)

VOC - Voice of the Customer

Improve Customer Satisfaction

Subgoals	Targets
Provide timely delivery	93%
Easy use of products, services	83.8%
Indicators	Targets
EXFC Overnight	93%
EXFC 2-3 Day	83.8%
Priority 2-3 Day	88.6%
Ease of Use Index	682 composite

VOB - Voice of the Business

Improve Financial Performance

Subgoals	Targets
Increase revenue	\$498M
Reduce cost, capital, expense	\$517.3M
Indicators	Targets
Commercial/Retail revenue	\$498M
Operating expenses	\$517.3M
Total workhours	below 17,173,063

KEY NUMBERS

Performance Cluster Stats

Wk 3, AP 11, FY '99

	EXFC	EXFC	PETE
	Onsite	2-3 Day	2-3 Day
Arkansas	92.0	84.8	80.1
Dallas	91.5	85.9	81.4
Fort Worth	92.1	82.8	78.2
Houston	91.7	82.6	86.0
Louisiana	92.1	83.2	80.4
Oklahoma	92.3	81.9	77.8
Rio Grande	94.8	86.3	77.3
Southwest Area	92.4	84.5	80.2

SAFETY

Lost Workday Injuries	YTD	SPY
Fort Worth	138	130
Frequency (200k woks.)	1.93	1.86
Southwest Area	1,127	1,197
Motor Vehicle Accidents	YTD	SPY
Fort Worth	171	182
Frequency (million miles)	8.16	6.49
Southwest Area	1,862	1,793

Struggling to cope with no-fee

Loss of revenue takes bite out of bottom line for rural post offices

by: KATHY FOSTER
Postmaster, Sanford

SANFORD -- More than a year into its implementation, rural postmasters across West Texas are struggling to counteract loss of revenue resulting from no-fee box service.

In April of last year, Headquarters extended no-fee post office box eligibility to "quarter-mile" customers. The change offered free P.O. Box usage for customers residing or conducting business within a quarter-mile of rural post offices and who are ineligible for any form of carrier delivery service. It affected several hundred thousand customers nationwide.

Wayne Phillips, Mailing Standards Specialist, who helped implement the no-fee box in Fort Worth District last year, said the no-fee box service is to be offered to all eligible customers by all post offices

that have rural delivery.

While acknowledging that it is a disliked policy by many postmasters, Phillips said there is a bigger picture.

"When they look at the bottom line, they see the revenue they've lost locally," Phillips said. "But while that shows that their office revenue is down, it's actually saving the Postal Service money."

"It keeps us from having to add new routes, from having to hire new rural carriers, keeps us from having to readjust routes every time a customer moves -- all of which saves the Postal Service a lot of time and money."

Milana Reisswig, Postmaster, Morse, said P.O. Box revenue at her Level 11 office is down more than 60 percent, from \$1,100 to \$418 this year. That loss, during a time of increasing budget consciousness, has been hard to overcome.

"Many of the customers are low-

income farm, or elderly and on a fixed income, and the money is not there for the retail items being offered by the Postal Service now," Reisswig said. "Revenue is down, and in a small office it is very hard to increase it in other ways."

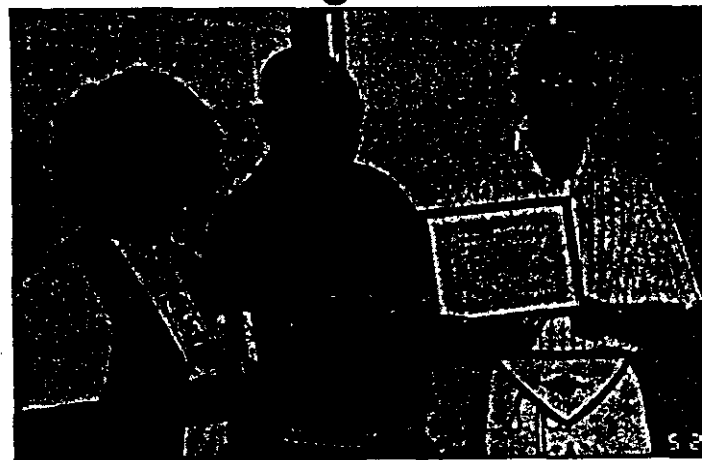
One of the largest drops in revenue is at the Level 15 Sunray PO. There, Postmaster Glenna Rummel reports more than an 80 percent drop in box revenue.

With only \$2,503 in P.O. Box revenue this fiscal year, the Sunray office has lost more than \$10,000 since the expanded no-fee box service.

Despite the dramatic impact on her revenue line, Rummel remains optimistic that in the long run the revenue will be recovered.

"The no-fee box service has decreased revenue, but it has increased the number of customers being served," Rummel said. "Hopefully that will mean something."

Cottles recognized for community service



Photo/Mc Johnson

MORAN -- Julie Cottle, left, and James Cottle were presented the Community Builder Award by Marvin Kays, right, of the Moran Masonic Lodge.

MORAN -- Like many other small communities across the Great Plains, the town of Moran has a dwindling population in terms of people. But not in terms of non-resident vacant lots and neglected buildings.

To help their community overcome the eyesores, James and Julie Cottle spend much of their free time in Moran mowing grass, painting buildings, planting flowers, hauling away debris, restoring buildings and even restoring Christmas decorations for the town streets.

James, known to many as "Buster," is a retired rural letter carrier. Julie still drives a rural route out of Moran. They donated a 70-by-15-foot mural depicting the town's boom days and helped raise funds for a city mini-park.

For their effort, the Moran Masonic Lodge recently presented each with the "Community Builder Award."

"Their efforts have resulted in instilling pride back into the community," said Marvin Kays of the Masonic Lodge. "It has resulted in a much safer and cleaner community and has attracted several people to purchase nearby property or retirees to come back home."

No truth to rumor on stamps

FORT WORTH -- There is absolutely no truth to a rumor making the rounds in Metroplex circles that the Postal Service is about to discontinue Black Heritage stamps.

The Black Heritage series fulfills a Postal Service mission to educate through stamps. There has been no talk within the Postal Service of discontinuing the series.

Lubbock drivers reach 3,000 years accident-free 2

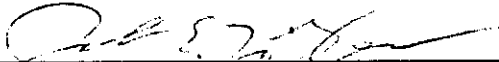
Morse PO doesn't leave customers hanging 3

Fill out the right form to stay on Postal mailing list 3

Celebrate The Century series: The 1920s 4

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



John E. McKeever
Attorney for United Parcel Service

Dated: March 13, 2000
Philadelphia, Pa.