

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

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POSTAL RATE AND FEE CHANGES, 2001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE
(OCA//USPS-T36-8, REDIRECTED FROM WITNESS MAYO)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T36-8, filed on October 1, 2001, and redirected from witness Mayo. The Postal Service also may file a partial objection to this interrogatory, depending on the results of its review of Office of the Inspector General audit reports.

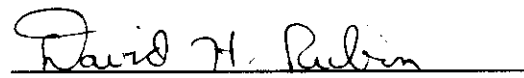
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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October 15, 2001

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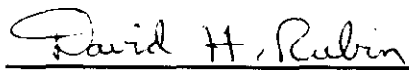
OCA-USPS-T36-8. Please identify all studies, claims, legal issues or proceedings involving the Postal Service and another party or parties regarding mail delivered to either the IRS or other taxing authorities. Include in your response the type and volume of accountable mail impacted, and the nature of the study, claim, legal issue or other proceedings. If a study or report has been performed, please provide a copy. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

RESPONSE:

Information of this type is not collected by the Postal Service. Inquiries to the Postal Service Consumer Advocate and to Postal Service claims attorneys reveal that studies, claims, legal issues, or proceedings are rare. Audit reports by the Office of the Inspector General (OIG) might be responsive. See the responses of the Postal Service to interrogatories DFC/USPS-1 and 2, filed October 11, and the Notice of United States Postal Service of Review of Responses to Interrogatories DFC/USPS-1 and 2, filed October 12. The article attached to Douglas Carlson's interrogatory DFC/USPS-118 in Docket No. R2000-1 also concerns a dispute about mail delivered to tax entities, but no claims were filed based on those episodes. A legislative hearing was held in Connecticut concerning that episode, but the Postal Service has no documents relating to that hearing. Field counsel reported one small claims case against the Postal Service filed by an individual who used Express Mail to meet a tax filing deadline. The Express Mail's delivery exceeded the service standard, but the case was dismissed because Express Mail liability does not extend to consequential damages, and the claimant would not have met the deadline even if the Express Mail had achieved its service standard.

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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