

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-64-65, 75-76, 79-81, 83-85)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate OCA/USPS-64-85, filed on October 17, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 31, 2001

**RESPONSES OF UNITED STATES POSTAL SERVICE TO
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OCA/USPS-64. The American Customer Satisfaction Index is a national economic indicator of customer satisfaction with the quality of goods and services available to household consumers in the United States. Approximately 30 government agencies participate in the Index.

- (a) Does the Postal Service currently participate in the Index?
- (b) If the answer to (a) is negative, please discuss why the Postal Service does not participate. Provide specific cites to all 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.
- (c) If the answer to (a) is positive, please furnish copies of all results.

RESPONSE:

- (a) Yes, the Postal Service is included in the Index.
- (b) Not applicable.
- (c) See objection filed on October 29, 2001.

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OCA/USPS-65. Has the Postal Service ever participated in the American Customer Satisfaction Index? If so, please furnish copies of the results.

- (a) If the answer is positive, please discuss why the Postal Service commenced its participation in the Index and what benefits or advantages it expected to accrue by participation. Provide specific cites to all 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.
- (b) If the Postal Service did at one time participate in the Index but no longer does, please discuss the circumstances that led to the cessation of participation and the reasons for ceasing to participate. Provide specific cites to all 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:

The Postal Service has been included in the Index since its inception, as part of the Transportation, Communications and Utilities sector. The Postal Service has never been given a choice as to whether to participate, but has simply been included in the list of organizations about which data has been collected.

Publicly available portions of the Index can be viewed at its website,

www.asq.org/info/acsi/scores/transcommutil.htm/.

(a) Objection filed on October 29, 2001.

(b) Objection filed on October 29, 2001.

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OCA/USPS-75.

The following interrogatory refers to Postal Service vending machines.

- (a) Has the Postal Service considered offering "rolls" of First-Class first-ounce letter stamps in its vending machines? If so, please explain when the service will be available to the public. If not, please explain why the service is not being offered.
- (b) Has the Postal Service considered allowing Postal Service vending machine customers to pay for their purchases with a credit card (e.g., MasterCard, Visa, etc.)? If so, please explain when the service will be available to the public. If not, please explain why the service is not being offered.

RESPONSE:

- (a) The Postal Service currently offers coils (rolls of 100) of basic First-Class Mail stamps in 5,000 vending machines nationwide.
- (b) The Postal Service has completed a test of vending machine debit/credit. At this time, it is expected that the Postal Service may present a Decision Analysis Report to the Board of Governors in the middle of calendar year 2002 for consideration. If the expenditure is approved, the Postal Service could begin to deploy vending machines capable of accepting credit cards as early as the first half of calendar year 2003.

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OCA/USPS-76. The following interrogatory refers to Postal Service Express Mail Label II-B dated July 1997. The back of Label 11-B has the following information, "Claims: Original customer receipt of the Express Mail label must be presented when filing an indemnity claim and/or for a postage refund."

(a) The Label 1 I-B further states that: [t]o file a claim for damage, the article, container, and packaging must be presented to the USPS for inspection. To file a claim for loss of contents, the container and packaging must be presented to the USPS for inspection. **DO NOT REMAIL.**

- (1) If the recipient files the claim, please confirm that the recipient does not need a copy of the "Original customer receipt of the Express Mail label." If you are unable to confirm, please explain who must file the original customer receipt, when the receipt must be filed, and where the receipt must be filed. See DMM SO10.2.8.
- (2) DMM SO1 0.2.7 states that : [i]f a claim is filed because some or all of the contents are missing, the customer must present the container and packaging to the USPS when filing the claim. Failure to do so results in the denial of the claim. Given this statement, please identify who the "customer" is – the sender or the recipient? If your response is the sender, please explain how the sender can present the container and packaging to the USPS without a "re-mail" occurring? If the customer is the recipient, does the recipient also need to supply the "Original customer receipt of the Express Mail label?" If so, please explain how the recipient is supposed to get the original Express Mail customer receipt label.

(b) On October 16, 2001, an Express Mail late delivery refund was requested at the Martin Luther King Station, in Washington, DC. The Express Mail piece was mailed on Friday, October 12, 2001 and as of Tuesday, October 16, 2001 it had not arrived at its destination. The sender asked the window clerk for the "original customer receipt of the Express Mail label" to be returned after the refund was processed so that in the event a future indemnity claim had to be filed the original receipt would be available. The window clerk stated that she could not return the receipt. In this situation, if the Express Mail package subsequently arrives late and is damaged or has a part of its contents missing, how does the sender or recipient file an indemnity claim since the "Original customer receipt of the Express Mail label" has already been turned over to the window clerk? If your response is that an indemnity claim cannot be filed without the receipt, please explain why the window clerk did not inform the sender when the postage refund was requested.

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RESPONSE:

(a)(1) Confirmed. The customer must present the original receipt, not a copy, with the article in order to file a claim, which can be filed by the sender or the recipient. The customer may also present the original wrapper to file a claim. Please see DMM S010.2.5.

(2) The customer could be the sender or the recipient, except in the case of a complete loss, in which a claim can only be filed by the sender. If the sender files the claim and the addressee has the damaged article, the sender's post office sends the claim to the addressee and the addressee presents the article to the Postal Service without remailing. Also, the addressee could possibly hand carry the article to the sender and the article could be presented without remailing. Please see DMM S010.2.8.

(b) The customer should not file for a refund of postage until they are sure that an indemnity claim will not be filed. The customer should file for complete loss only after seven days. Also, the window clerk should have informed the customer that the postage refund would have to be included in any claim for indemnity, so that the indemnity amount and the postage amount can be filed together.

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OCA/USPS-79. The following refers to USPS-LR-J-144, volume 1. Please provide a copy of the video "Priority Mail" identified on page 109 of "Module 5: Domestic Mail."

RESPONSE:

See USPS-LR-J-160, Priority Mail and Express Mail Training Videotapes, Provided in Response to OCA/USPS-79, 81.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORIES**

OCA/USPS-80. The following information is provided in USPS-LR-J-144, volume 1, Module 5: Domestic Mail at page 112.

First Class/Priority - handwritten or typewritten personal correspondence such as bills, statements of account, postal cards, and business reply mail. It is closed against inspection. Something small such as circulars, booklets, flower bulbs, devices, keys, seeds, etc. Normally 2-3 day service (Priority) not guaranteed.

Given this First-Class/Priority mail information provided to "new Sales and Services Associates" and the difference in postal rates between the two offerings, please explain why a postal customer should spend more money to ship something via Priority Mail versus First-Class Mail when both apparently have a 2-3 day service standard and neither guarantees a delivery standard.

RESPONSE:

Although Priority Mail and First-Class Mail both have 1-3 day delivery standards, the 2-day service standard range is much wider for Priority Mail than for First-Class Mail. In fact, while the majority of Priority Mail's three-digit ZIP Code pairs have a 2-day service standard, the majority of First-Class Mail's three-digit ZIP Code pairs have a 3-day service standard. Consequently, service standards are higher (faster), on average, for Priority Mail than for First-Class Mail.

While neither Priority Mail nor First-Class Mail guarantees on-time delivery, Priority Mail has other advantages over First-Class Mail:

- Delivery Confirmation is available for all Priority Mail pieces, not just parcels, as proposed for First-Class Mail in USPS-T-36.
- The Postal Service provides free boxes, tape, stickers, labels, and envelopes for Priority Mail but not for First-Class Mail.

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Response to OCA/USPS-80 (Cont.)

- Priority Mail gets mail processing priority over First-Class Mail. See Postal Operations Manual, Section 453.
- Priority Mail is “in line” for dispatch to transportation resources, both air and surface, ahead of First-Class Mail.
- While First-Class Mail and Priority Mail both get top delivery priority (see Postal Operations Manual, Section 621.1), Priority Mail will be delivered first in the unlikely event that not all Priority Mail and First-Class Mail can be taken out for delivery. In addition, during the year-end holiday season, if necessitated by local operating conditions, Priority Mail, but not First-Class Mail, will be delivered on supplemental Sunday routes.
- Priority Mail may receive less handling than other mail.

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OCA/USPS-81. The following refers to USPS-LR-J-144, volume 1. Please provide a copy of the video "Express Mail" identified on page 125 of "Module 6: Express Mail Service."

RESPONSE:

See USPS-LR-J-160, Priority Mail and Express Mail Training Videotapes, Provided in Response to OCA/USPS-79, 81.

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OCA/USPS-83. For the following interrogatory, please assume that a postal recipient arrives at a postal window with a complaint about merchandise that was sent to the recipient with "delivery confirmation." However, the recipient never received the merchandise and is now in receipt of bills for the undelivered merchandise. The store claims the recipient received the merchandise.

(a) If the merchant must file the claim and has information that the merchandise was delivered, please explain how the postal recipient is able to verify who actually received the merchandise.

(b) How does the postal recipient use the "Delivery Confirmation" service? Since the postal recipient ordered the merchandise and was charged for postal expenses, who is the customer of the Postal Service?

(c) What guidance are the postal clerks given in accepting postal patron complaints regarding "Delivery Confirmation" service?

(d) What actions does the Postal Service take in researching and resolving a "Delivery Confirmation" complaint?

(e) What is the average time a postal consumer can expect to wait for a response from the Postal Service regarding a claim of this type?

(f) Which Postal Service department(s) would have responsibility for this complaint?

(g) If the "Delivery Confirmation" research shows that the merchandise was not actually delivered to the recipient, what recourse through the Postal Service does the recipient have to resolve the issue with the merchant? Include in your response the steps that the Postal Service will take to assist the recipient.

RESPONSE:

(a) Delivery Confirmation service provides the date, time, and ZIP Code of delivery (or delivery related event). It does not capture the recipient name.

(b) Although we serve both, in this instance, the "customer" would be the mailer who chose to use Delivery Confirmation service, and who obtained the Delivery Confirmation service number when mailing the article. The

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postal recipient can check the Delivery Confirmation information if the mailer provides the recipient with the Delivery Confirmation service number for the item at issue.

- (c) Delivery Confirmation complaints would be handled like complaints for other special services. Management Instruction PO-250-93-2 (attached), which is being updated to reflect organizational changes, provides guidance on the minimum requirements for handling, tracking, and assigning accountability for timely response to customer complaints. The customer can complete a Consumer Service Card, which has a response commitment, either in writing or verbally, within five days. Also, see the training materials provided in library reference J-144, including Sales and Service Associate Training, Module 21, Delivery Confirmation.
- (d) If the customer states that they did not receive the service expected, this is confirmed by looking up the item and seeing if a delivery or other delivery-related scan is present. If it is not, the customer is eligible for a service fee refund.
- (e) Requests for service failure refunds are generally handled while the customer waits. General service complaints at the local level are also generally handled while the customer waits, although sometimes follow up is necessary. DMM P014 addresses refund policy issues, which are subject to local discretion; no length of time is listed for non-indemnity

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special service items. A Consumer Service Card can be filed about any service failure. Cards are logged and local commitment is a response, either verbally or in writing, within five days.

- (f) The local Post Office is responsible for dealing with individual customer complaints. Escalation would be to the District Consumer Affairs Office.
- (g) Delivery Confirmation service does not indicate a specific recipient. It only indicates a delivery (or delivery-related) scan event. So the research could only show whether or not the item was delivered, rather than that the merchandise was or was not delivered to a particular recipient. Thus, Delivery Confirmation service cannot resolve a dispute about whether an item was delivered to a particular recipient.



Management Instruction

Complaint Resolution and Proper Use of the Consumer Service Card

This instruction establishes the minimum requirements and standard response time for answering customer complaints and establishes procedures for handling, tracking, and assigning accountability for timely response. Postal employees are to ensure timely, customer-friendly, and professional complaint resolution.

Date	August 12, 1993
Effective	Immediately
Number	PO-250-93-2
Obsoletes	MI-PO-250-91-3
OCC Code	CA101
<i>Ann McK. Robinson</i>	
Ann McK. Robinson Vice President and Consumer Advocate	

BACKGROUND

The Customer Satisfaction Index indicates that prompt response to and resolution of customer complaints will increase customer satisfaction with the complaint handling process. The Customer Satisfaction Index points out areas where prompt response is receiving low marks from our customers and needs improvement.

SCOPE

The following, or their designees, are responsible for implementing these requirements and for informing assigned personnel about local procedures for responding to or forwarding complaints received:

1. Headquarters Consumer Affairs.
2. Area office managers.
3. Customer Services district managers.
4. Plant managers.
5. Consumer Affairs and Claims managers.
6. Postmasters and station or branch managers.
7. Postal employees delegated responsibility for handling complaints.

SOURCE OF COMPLAINTS

The Postal Service receives complaints from business and residential customers who report them through:

1. Form 431 4-C, *Consumer Service Card (English)*.
2. Form 4314-A, *Consumer Service Card (Spanish)*.
3. Telephone and personal contact.
4. Written correspondence, including customer surveys (e.g., the Customer Satisfaction Index).
5. Headquarters to field referrals (customer correspondence initially directed to the postmaster general or the

consumer advocate, then reassigned to the field for resolution).

6. Governmental inquiries from the legislative and executive branches of the federal government.

RESPONSIBILITY

Headquarters Management. Headquarters Consumer Affairs is responsible for establishing requirements and measuring compliance with this instruction.

Field Management. The following managers must ensure compliance with this instruction and resolve complaints within their areas of responsibility:

1. Area managers.
2. District managers.
3. Plant managers.
4. Consumer Affairs and Claims managers.
5. Postmasters and station or branch managers.

■ Consumer Affairs and Claims managers must also do the following:

1. Monitor activity throughout their respective districts for compliance with this instruction.
2. Refer customer complaints to the appropriate functional areas for resolution.
3. Establish and maintain a customer complaint file.

■ Postmasters and station or branch managers must also do the following:

1. Ensure that their offices meet the requirements of this instruction.
2. Maintain one or more customer complaint control logs (see example on page 4).
3. Investigate and take corrective action to resolve complaints by contacting and working with other

functional areas of the Postal Service, if necessary, to resolve customer complaints.

4. Establish and maintain a complaint file.
- Other postal employees, especially window clerks, are to provide the customer with a Consumer Service Card or refer the customer to the appropriate functional area.

PROCEDURES

Time Frames. Follow the procedures in the following chart to ensure that necessary actions are performed within the indicated time frames:

	<u>Time Frame</u>	<u>Action</u>
Initial Contact	Within 24 hours after receiving complaint	Acknowledge complaint by preprinted postcard, letter, telephone call, or personal contact with the customer.
Final Response	Within 14 days after receiving complaint	Send a final response to the customer by telephone, letter, or personal contact. The final response must be comprehensive and either describe how the problem was or will be corrected, or explain why the problem cannot be corrected.

Exception to Final Response Requirement. The final response time discussed above does not apply to complaints requiring issuance of a publication watch for daily, weekly, and monthly newspapers or magazines. All other requirements do apply. Process the publication watch in accordance with Management Instruction PO-440-88-4, *Publication Watch Revised Form and procedures*, dated 10/21/88. The timeframes for responding to these complaints areas follows:

<u>Type of Publication</u>	<u>Final Response Due</u>
Daily	Within 35 days after complaint received
Weekly	Within 45 days after complaint received
Monthly	Within 75 days after complaint received

Maintaining Customer Complaint Control Log. Maintain one or more customer complaint control logs at every office to ensure timely response to customer complaints and to facilitate routine analysis of complaint activity.

Content. Include the following information in the customer complaint control log:

1. Office name and ZIP Code.
2. Customer name.
3. Company name, if applicable.

4. Customer address.
5. Customer telephone number.
6. Control number (i.e., Consumer Service Card number).
7. Subject of complaint.
8. Type of contact.
 - a. Type of 24-hour acknowledgment (i.e., telephone, letter, postcard, personal).
 - b. Type of final response (i.e., telephone, letter, personal).
9. Date received.
10. Suspense date.
11. Assignment of responsibility for suspense and resolution of the complaint.
12. Date closed.

Complaints Resolved Immediately. If a complaint received over the telephone or in person is resolved immediately, document the contact in the customer complaint control log. However, if further investigation is needed, advise the customer and complete a Consumer Service Card.

Completing the Consumer Service Card. The Consumer Service Card is completed by one of the following methods:

1. A customer completes the Consumer Service Card, retains copy 1, and either gives the form to a postal employee or mails it, following the directions on the top of copy 1.
2. A postal employee completes a Consumer Service Card when a customer comment is received over the telephone, in person, or by letter when follow-up action must be taken or the comment or complaint must be referred elsewhere for action or resolution.

Processing a Complaint Made in Person. Follow these instructions when processing a Consumer Service Card that is received in person:

1. Ensure that the customer has provided complete information if he or she hands in the Consumer Service Card in person. Verify that the following information is legible on all parts:
 - a. Card number.
 - b. Customer name.
 - c. Complete address and ZIP Code.
 - d. Card date.
2. Enter the information in the customer complaint control log using the Consumer Service Card number as the control number.
3. Carefully separate and send copy 2 of the Consumer Service Card to the St. Louis Consumer Service Card Unit on the same date the Consumer Service Card is received from a customer or completed by a postal employee.
4. Acknowledge having received the complaint, within 24 hours, by preprinted postcard, letter, telephone call, or personal contact.

5. Investigate the complaint.
6. Document the response in the *USPS Use Only* section on copy 3 of the Consumer Service Card. Include the date the customer was contacted, who made the contact, and a brief description of the action taken.
7. Send copy 3 to the Consumer Service Card Unit on the date action is completed and file copy 4 locally, along with any letters or attachments.

NOTE: Copies 2 and 3 should be sent to the Consumer Service Card Unit on the same day only if follow-up action is completed on the same day the comment is received.
8. Enter the date the complaint was closed on the customer complaint control log.

Processing a Written Complaint. Follow these instructions when processing a written complaint:

1. Transfer all vital information from the letter of complaint to a Consumer Service Card and enter it in the customer complaint control log using the Consumer Service Card number as the control number.
2. Follow processing procedures above.

Processing a Telephoned Complaint. Follow these instructions when processing a complaint made by telephone:

1. Complete a Consumer Service Card and log it in the customer complaint control log using the Consumer Service Card number as the control number.
2. Follow processing procedures above.

Mailing the Consumer Service Card. Instructions for mailing the Consumer Service Card to the Consumer Service Card Unit are as follows:

1. Do not staple Consumer Service Cards or include attachments, such as letters. (Attachments should be filed locally with copy 4.) Document all relevant information in the appropriate sections of the Consumer Service Card.
2. Do not fold the Consumer Service Card. Use an envelope measuring 6-1/2 inches by 9-1/2 inches or larger.
3. Divide copies 2 and 3 into separate batches. Mail both batches in one envelope each day to:

CONSUMER SERVICE CARD UNIT
UNITED STATES POSTAL SERVICE
PO BOX 80479
ST LOUIS MO 63180-9479.

Headquarters to Field Referrals. The following apply:

1. The Consumer Affairs and Claims manager is responsible for transferring information from customer correspondence to the customer complaint control log, for assigning the suspense date, and for ensuring that an appropriate response is made within 14 days from the date the district office received the complaint.

2. Field offices must respond within the assigned suspense date established by the Consumer Affairs and Claims manager.
3. 24-hour acknowledgment will have been made by Headquarters.

Government Inquiries. Process inquiries from legislative and executive branch officials as follows:

1. Follow procedures in *Administrative Support Manual 338*.
2. Process inquiries regarding service to a postal customer in the area served as written correspondence. These inquiries must receive prompt and conscientious attention.

MEASUREMENT OF EFFECTIVENESS

Consumer Affairs monitors the quality and timeliness of complaint resolution by conducting reviews of the following:

1. Customer Satisfaction Index.
2. Consumer Affairs field audits.
3. Periodic reports on the Consumer Service Card program.

BENEFITS

The Postal Service expects to:

1. Improve customer satisfaction with the complaint handling process.
2. Establish accountability for effective resolution of customer complaints.
3. Identify and correct service deficiencies which cause complaints.

REFERENCES

The following reference material, available from the material distribution centers, must be accessible to assist postal employees in resolving complaints related to Postal Service policy or regulations:

- *Domestic Mail Manual (DMM)*
- *Administrative Support Manual (ASM)*
- *International Mail Manual (IMM)*
- *Posts/ Operations Manual (POM)*
- Handbook PO-250, *Consumer Answer Book*
- Handbook M-38, *Management of Rural Delivery Services*
- Handbook M-41, *City Delivery Carriers Duties and Responsibilities*
- Handbook PO-102, *Retail Vending Operational and Marketing Program*, Chapter 8, *Customer Complaints*.

Customer Complaint Control Log

Office Name

ZIP Code

Customer or Company Information			Control No. (GSC)	Subject	Type of Contact		Date Received	Suspense Date	Assigned To	Date closed
Name	Address	Phone No.			C = Postcard P = Personal L = Letter T = Telephone					
					Initial (Within 24 Hrs.)	Final				

Management Instruction, PO-250-93-2

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OCA/USPS-84. Are all complaints received by the Postal Service investigated? If not, please explain why all complaints are not investigated. For routine type complaints, such as "I am tired of receiving my neighbors mail," what is involved in researching and resolving the complaint? Include in your response any differences in processing and resolving a complaint that involves (1) a city carrier route and (2) a rural carrier route.

RESPONSE:

The Postal Service policy is to address all complaints promptly. See the Management Instruction attached to the response to OCA/USPS-83. Currently, each field office is responsible for handling the complaints it receives. Escalation would be to the District Consumer Affairs Office. There is no difference in how rural or city carrier complaints are handled.

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OCA/USPS-85. What type of training do Postal Service sales and service employees receive for handling complaints?

RESPONSE:

Sales and service employees receive Sales and Services Associate Training.

For training materials on handling complaints, see, for example, USPS-LR-L-144, modules 24 and 26 in both Volume I (Facilitator's Guide) and Volume II (Associate's Workbook).

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.


Richard T. Cooper

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October 31, 2001