

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  
WITNESS MEEHAN TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T11-5, 6, and 8)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of United Parcel Service: UPS/USPS-T11-5, 6 and 8, filed on November 9, 2001. Interrogatory UPS/USPS-T11-7 was redirected to the Postal Service.

Each 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:

  
\_\_\_\_\_  
Susan M. Duchek

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November 23, 2001

Response of United States Postal Service Witness Meehan  
to  
Interrogatories of United Parcel Service

**UPS/USPS-T11-5.** Provide the total cost in BY 2000 of the Postal Service's call centers.

**Response:**

Although the BY 2000 CRA doesn't explicitly track postal call center costs, I am informed that in BY 2000, the call center cost was approximately \$116 million.

Response of United States Postal Service Witness Meehan  
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**UPS/USPS-T11-6.** Identify the cost segment and component in which the Postal Service's call center costs are accrued.

**Response:**

Call centers are not explicitly listed in the cost segment and component report.

However, I have been provided with the costs, which I show below. The cost components that these costs are a portion of are shown as well, along with a reference to the page(s) that most clearly show the cost component's distribution.

Amount(\$)	Cost Segment/Comp. that each amount is a portion of	Workpaper and page number where distribution is shown
77,711	1/1	A-1 pp. 1-2
66,635	2/284	Exh. A pp.17-18.1
75,730	3/478	Exh. A pp.23-24.1
2,200	11/81	A-4 p. 9-10.1
4,380	13/117	A-1 p. 54
3,450	13/141	A-2 pp. 93-94.1
1,314,104	15/165	A-4 pp.11- 12.1
8,279	15/166	A-4 pp.13-14.1
387,001	15/167	A-4 pp. 13-14.1
21,517,214	15/168	A-1 p. 70
29,978	15/169	A-1 p. 70
26,117	15/170	A-1 p.70
460,519	16/174	A-1 p. 74
38,372	16/175	A-1 p. 74
2,074	16/176	A-4 pp. 15-16.1
5,339,552	16/177	A-2 pp. 113-114.1
3,965	16/179	A-1 p. 72
773,931	16/182	A-1 p. 72
13,486	16/246	A-1 p. 76
4,797,064	18/191	A-1 p. 80
16,051	18/193	A-1 p. 80

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9,948	18/204,205,541	A-2 pp. 125-128.1
61,969,376	18/210	A-1 p. 88
11,922,789	18/211	A-1 p. 88
37,300	18/1429	A-1 p. 90
24,192	19/220	A-1 p. 92
6,725,249	20/232	A-4 pp. 29-30.1
112,952	20/236	A-4 pp. 31-32.1
660,673	20/237	A-4 pp. 31-32.1
(37,470)	20/245	A-1 p. 106
(195,886)	20/249	A-1 p. 106~
42,358	20/1437	A-1 p. 102

**Response of United States Postal Service Witness Meehan  
to  
Interrogatories of United Parcel Service**

**UPS/USPS-T11-7.** Does the Postal Service measure or record any information on the activities that Postal Service call center personnel perform? If so, describe the nature of the information that is collected and how it is used.

**Response:**

Redirected to the Postal Service.

**Response of United States Postal Service Witness Meehan  
to  
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**UPS/USPS-T11-8.** Has the Postal Service studied the costs of operating the call centers? Provide the distribution of these costs to Postal Service products and describe the methodology that is used to distribute call center costs to Postal Service products.

**Response:**

Please see my response to UPS/USPS-T11-6 for the citations of the distribution of costs. No special cost study was performed in making the call center cost distributions listed in UPS/USPS-T-6 above. The methodologies for distributing costs are described in USPS-LR-J-1.

## DECLARATION

I, Karen Meehan, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Karen Meehan

Dated: 11/23/01

**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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Susan M. Duchek

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