

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

**PARTIAL OBJECTION OF THE UNITED STATES POSTAL
SERVICE TO THE OFFICE OF THE CONSUMER ADVOCATE'S
INTERROGATORIES OCA/USPS-255-258
(December 6, 2001)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby partially objects to interrogatories OCA/USPS-255-258, filed on November 26, 2001 on grounds of relevancy and vagueness. The Postal Service does not object to providing answers to subpart (a) of each interrogatory, but does object to answering the remaining subparts. At the heart of the objections to Interrogatories 255-258, is the issue that the Postal Service has had to raise repeatedly during discovery: the relevancy of the requested information to *this* proceeding, a proceeding whose outcome is a recommended decision on rates and fees. As such, the Postal Service incorporates by reference the general objections propounded in the Objection of The United States Postal Service to OCA/USPS-231-233, 243, 245-247, 268-285 and 290 and Partial Objection to OCA/USPS-239-242, 244, 248-253, filed on December 3, 2001.

I. Preliminary Statement

Each interrogatory addresses different Customer Satisfaction Measurement (CSM) surveys and has a similar structure. Each requests three types of information. Subpart (a) seeks information on how the Postal Service

determined the survey is statistically accurate. The middle subparts request details about the accuracy and the results by a variety of characteristics (for example, region, ethnic origin of respondents, urbanicity, or industry segment). The final two subparts request every change the Postal Service has ever considered or implemented as a result of the survey. Because of the parallel structure of the interrogatories, the objections are generally stated below.

II. Overall Statistical Accuracy

Although the Postal Service is not objecting to answering the question about overall statistical accuracy of each survey, a discussion is warranted in light of the requests in the subsequent subparts. There is no issue about the relevancy of the questions on overall credibility of the results. To date, the OCA has sought information about the district, regional and national results of the four surveys for over 10 years.¹ As a result of objections by the Postal Service², the OCA subsequently limited its request to the *national* results for four years: FY1994, 97, 00 and 01.³ The Postal Service has already provided, pursuant to protective conditions, national results of FY2000 and FY2001 results of class-

¹ See Office of the Consumer Advocate Interrogatories to the United States Postal Service OCA/USPS-7, filed on September 28, 2001, and OCA/USPS-51-57, filed on October 15, 2001.

² See Partial Objections of the United States Postal Service to the Office of Consumer Advocate's Interrogatories OCA/USPS 51-57 and Joint Motion , filed on October 9, 2001, and Objections of the United States Postal Service to the Office of Consumer Advocate's Interrogatories OCA/USPS 51-57 and Joint Motion , filed on October 15, 2001.

³ Office of the Consumer Advocate's Motion to Compel Production of Documents Requested in OCA/USPS-51-57, filed on October 30, 2001 at 2.

specific information.⁴ As such, a request for information on the credibility of the survey results would be within the scope of relevancy.⁵

III. Request for Characteristic Specific Information

By comparison, the requests for detailed information related to certain characteristics are clearly beyond the scope of relevancy. As argued in a previously filed objection, the individual results below the national level would not be relevant to the Commission's evaluation of the overall value of service provided a particular class or service, on a system-wide basis. Objections of the United States Postal Service to the Office of Consumer Advocate's Interrogatories OCA/USPS 51-57 and Joint Motion, filed on October 15, 2001, at 3. The Commission has never contemplated recommending rates on any other basis than a national one and the Postal Service certainly does not seek to change that here. The OCA acknowledged this when it limited its request to national results⁶ but now seeks to ferret out "regional" information (255(b)) as well as information based upon ethnic origin (255(c)), urban/rural/suburban or urbanicity (255 (d)), industry segment (subpart (b) of 256-58), value of postal products purchased (subpart (c) of 256-258), volume mailed (subpart (d) of 256-258) and job title (subpart (e) of 256-258).

⁴ While the Postal Service still maintains that non-class-specific survey results are irrelevant, the Postal Service has offered to provide additional national survey results for the four years cited pursuant to a grant of protective conditions. See Motion for Protective Conditions for Customer Satisfaction Survey Results filed on November 13, 2001. This motion is the subject of an ongoing discovery dispute.

⁵ The Postal Service continues to maintain that non-class-specific survey results are not relevant.

⁶ See footnote 3, *supra* and accompanying text.

Unless the Commission is considering setting rates and fees based on ethnic origin, region, urbanicity or any of the other characteristics listed, the information is simply not relevant. The information may be interesting to the OCA and it may be of great value to the management of the Postal Service⁷ it is not relevant to this proceeding.

IV. Changes Driven By Survey Results

OCA's requests for a "discussion" of every change the Postal Service has ever considered or implemented as a result of the survey is similarly irrelevant, and frankly, an impossible quest. When the day is done and this proceeding is concluded, the outcome will be a recommended decision on rates and fees. How the survey results have driven changes at the Postal Service has no bearing on that outcome. Once again, the OCA misapprehends the role of the Commission. The Commission has no authority to manage the Postal Service. It has no authority to order management to "change" any current practice or policy or to take actions to improve customer satisfaction scores.

Moreover, the request for the information about changes driven by survey results is so vague and overbroad, it is impossible to provide a response. What exactly is meant by the nebulous word "change"? Is it a change in attitude? A change in policy? A change in product offerings? A change in operations? What exactly is meant by the ambiguous phrase "changes the Postal Service has considered"? Would any idea contemplated by an employee be covered? What about ideas "considered" by a group of employees? Or is it only ideas considered

⁷ See Declaration of Max D. Larsen, attached to Reply of the United States Postal Service to the Office of Consumer Advocate's Response To Motion For Protective Conditions for Customer

by a manager, be she local or part of senior management? Must the ideas be committed to writing?

Moreover, the questions also have no limit on time period or scope: Are all "changes" since the advent of CSM surveys covered? Does it cover "changes" considered or implemented at every level and every location of the Postal Service?

Even if the questions were limited in time period and scope to "initiatives," there is no conceivable way to provide the information sought.⁸ There is no centralized source listing survey results-inspired initiatives. For many years, the CSM survey results have been provided as an important tool for managers and supervisors at every level of the Postal Service. Any employee may recommend a change anywhere in the organization to improve customer service and satisfaction. Postal managers in the field may consider or implement initiatives to improve customer satisfaction as they see fit and these are as varied and numerous as the employees making the changes.

Furthermore, management decisions are based upon a totality of information available. Survey results may be just one of many subjective inputs in a manager's decision. Quantifying the weight of subjective inputs or attributing causation to a single information source would be a fruitless task.

V. Conclusion

With the exception of the request for information about the statistical accuracy of the survey results at a national level, all other information requested

Satisfaction Survey Results, filed on November 28, 2001.

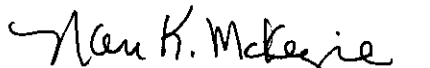
in Interrogatories 255-258 is irrelevant. Moreover, questions about the "changes" considered or implemented as a result of the survey are vague. Accordingly the Postal Service objects to Interrogatories OCA/USPS-255-258.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

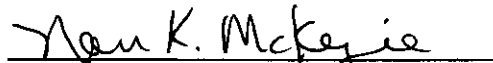
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Nan K. McKenzie
Attorney

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.


Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089; Fax: 5402
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⁸ For this reason, the Postal Service is not objecting on the basis of overbreadth, which implies that a narrowing of the scope would alleviate the basis for objection.