

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 UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MEEHAN
(UPS/USPS-T11-9-14)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T11-9-14, filed on November 21, 2001, and redirected from witness Meehan.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
December 7, 2001

Response of United States Postal Service
to
Interrogatories of United Parcel Service
(Redirected from witness Meehan, USPS-T-11)

UPS/USPS-T11-9. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales.

(a) For which products and services has the Postal Service developed national sales policies and/or programs? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to develop the national sales policy and/or program for that product or service.

(b) For which products and services has the Postal Service developed and implemented sales strategies and plans? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to develop and implement that product or service's sales strategies and plans.

(c) For which products and services has the Vice President of Sales directed lead generation activities and initiatives? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used for lead generation activities and initiatives for that product or service.

(d) For which products and services has the Vice President of Sales managed, developed, implemented, and/or improved direct selling programs? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, implement, and/or improve direct selling programs for that product or service.

(e) For which products and services has the Vice President of Sales managed, developed, and/or implemented systems and solutions related to increasing high impact sales? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, and/or implement systems and solutions related to increasing high impact sales for that product or service.

Response:

(a) The Postal Service develops policies and programs to sell the entire set of Postal products and services to its customers based on customer needs. Sales Representatives are trained and developed to be able to sell all products and services of the Postal Service. Costs of the Sales Function are not allocated by product and service.

Response of United States Postal Service
to
Interrogatories of United Parcel Service
(Redirected from witness Meehan, USPS-T-11)

(b) The Postal Service develops strategies and initiatives to sell all products and services in accordance with customer needs. Separate plans for individual products and services are not developed. Costs to support the development of strategies and initiatives are not allocated by products and services.

(c) The Postal Service conducts lead generation activities and initiatives to support sales of all products and services. The lead management system of the Postal Service manages the leads for all products and services. Costs of the lead management program of the Postal Service are not allocated by products and services.

(d) It is the policy of the Postal Service Sales Function that its direct selling programs sell all products and services depending on customer needs. Costs of the direct selling programs of the Postal Service are not allocated by product and service.

(e) The Postal Service Sales Function sells to all commercial sales opportunities, *high impact or otherwise, whether or not with existing or new customers, in a consultative manner.* All products and services of the Postal Service are sold to commercial customers in this manner. The costs of managing the sales function are not allocated by product and service.

Response of United States Postal Service
to
Interrogatories of United Parcel Service
(Redirected from witness Meehan, USPS-T-11)

UPS/USPS-T11-10. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Postal Service developed national sales policies and/or programs for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to develop national sales policies and/or programs for First Class Single Piece mail.

Response:

The Sales Function of the Postal Service has not developed national sales policies and/or programs specifically for First Class Single Piece mail. The costs within the Sales Function are not allocated by product or services.

Response of United States Postal Service
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Interrogatories of United Parcel Service
(Redirected from witness Meehan, USPS-T-11)

UPS/USPS-T11-11. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Postal Service developed and implemented sales strategies and plans for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to develop and implement sales strategies and plans for First Class Single Piece mail.

Response:

The Sales Function of the Postal Service has not developed sales strategies and plans specifically for First Class Single Piece mail. The costs within the Sales Function are not allocated by product or service.

Response of United States Postal Service
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Interrogatories of United Parcel Service
(Redirected from witness Meehan, USPS-T-11)

UPS/USPS-T11-12. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales directed lead generation activities and initiatives for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used for lead generation activities and initiatives for First Class Single Piece mail.

Response:

The Vice President of Sales has not directed lead generation activities and initiatives specifically for First Class Single Piece mail. The costs with the Sales Function are not allocated by product or service.

Response of United States Postal Service
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Interrogatories of United Parcel Service
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UPS/USPS-T11-13. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales managed, developed, implemented, and/or improved direct selling programs for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, implement, and/or improve direct selling programs for First Class Single Piece mail.

Response:

The Vice President of Sales has not managed, developed, implemented, and/or improved direct selling programs specifically for First Class Single Piece mail.

The costs within the Sales Function are not allocated by product or service.

Response of United States Postal Service
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USPS-T11-14. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales managed, developed, and/or implemented systems and solutions related to increasing high impact sales for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, and/or implement systems and solutions related to increasing high impact sales for First Class Single Piece mail.

Response:

The Vice President of Sales has not managed, developed, and/or implemented systems and solutions related to increasing high impact sales specifically for First Class Single Piece mail. Systems costs, as with other costs within the Sales Function, are not allocated by product or service.

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
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