

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

RECEIVED

Dec 10 5 36 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OCA/USPS-306(b) and (c)
(December 10, 2001)**

The United States Postal Service hereby objects to interrogatory OCA/USPS-306(b) and (c). The information requested lacks relevance to this proceeding.

OCA/USPS-306, provides, in its entirety:

The following refers to the USPS response to UPS/USPS-T11-7, dated November 23, 2001.

- [a] Are the call centers referenced in the USPS response referring to the "1-800-ASK-USPS" centers? If not, please explain the difference between the centers.
- [b] If the "1-800-ASK-USPS" phones are answered by contractors, how is the performance of each phone operator evaluated? Also, what is the basis upon which each phone operator is compensated (e.g., Volume of calls, types of calls taken, etc.)?
- [c] If the "1-800-ASK-USPS" service is contracted out, how is the contractor's performance evaluated?
- [d] If the "1-800-ASK-USPS" service is contracted out, what is the basis for the contractor's compensation?

The Postal Service will respond to subpart (a), as that question seem to follow up legitimately on the previous response. The Postal Service also will respond to subpart (d), as that question may have at least some tangential relationship to the costs of call centers.


The Postal Service objects, however, to responding to subparts (b) and (c) as these questions deal with details of the contractual relationship between the Postal Service and the call center contractor that has no bearing on the issues in this proceeding. Neither the performance of individual call center operators and the call center contractor nor the manner in which such are evaluated are at all relevant to the rate, fee and classification proposals under consideration in this case. Accordingly, the Postal Service should not have to respond to these subparts.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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
December 10, 2001