

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

NOTICE OF THE UNITED STATES POSTAL SERVICE  
REGARDING THE FILING OF  
FINAL DECLARATION TO ACCOMPANY DECEMBER 10, 2001, REPLY

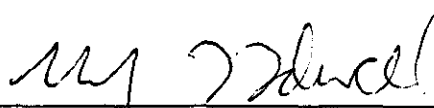
On December 10, 2001, the United States Postal Service filed its reply to the answer of Complainant in opposition to the motion for application of protective conditions to the response to DFC/USPS-9. In that reply, the Postal Service indicated that pertinent Declarations of several postal officials would be filed no later than Wednesday, December 12, 2001. Two of those Declarations were filed on that date, with a notice indicating that the final declaration would be filed today. It is hereby attached and filed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking



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Michael T. Tidwell  
Attorney

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December 13, 2001

BEFORE THE  
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Docket No. C2001-3

**Declaration of Greg Whiteman**


I, Greg Whiteman, declare:

1. Since January, 2000, I have been employed as Manager, Market Intelligence and Segmentation, Marketing Department, United States Postal Service headquarters. My responsibilities include the assessment of competition as it affects postal services, including First-Class Mail.
2. I have reviewed the December 12, 2001, Declarations of Francia Smith and Richard Prescott that are being filed in this proceeding. I am familiar with the point-specific EXFC days-to-deliver data and the point-to point and point-specific ODIS volume, time-in-transit, and days-to-deliver data described in their Declarations.
3. These disaggregated data are invaluable in developing an understanding of the nature of First-Class Mail service on a local level. The data provide an indication of service quality for particular postal markets and could be utilized by postal competitors to assess which localities or market sectors are either more or less susceptible to diversion.
4. The Postal Service does not publicly disseminate these disaggregated point-specific or point-to-point data for any mail class. The Postal Service considers point-to-point or point-specific ODIS volume and service performance estimates to be commercially-sensitive and privileged information. The data are considered proprietary, because they could be used by a competitor to damage the competitive position of the Postal Service. For example, a competitor could use disaggregated ODIS and EXFC to explore the feasibility of targeting specific markets for online bill presentment and payment services to compete with First-Class Mail. Selective reporting of point-specific EXFC and ODIS data could cause harm to the Postal Service's commercial interests, its brand equity and its revenues. Disclosure would allow a competitor to gain invaluable data about the marketplace and product performance. For instance, point-specific days-to-

deliver data could be used by a postal competitor to identify with great specificity the strengths and weaknesses of the Postal Service's share of the market for matter that can be transmitted via First-Class Mail, thereby allowing that competitor to target its marketing and other resources to areas of vulnerability, or to avoid competition where the Postal Service is perceived strongest.

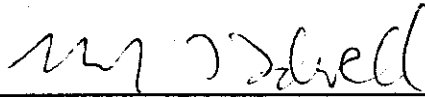
5. I am aware of no private delivery service, First-Class Mail competitor, or other transportation or delivery firms that release disaggregated, market-specific days-to-deliver service performance data or point-to-point volume or service performance data. I am aware of no telecommunications firm that releases similar service performance data. Public disclosure of such postal data would place the Postal Service at an unfair disadvantage, since competitors are not known to publish similar data.

December 13, 2001

  
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Greg Whiteman

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.



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