

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

REPLY OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DOUGLAS CARLSON
REGARDING THE RESPONSE TO DFC/USPS-GAN-43
(January 2, 2002)

The United States Postal Service hereby responds to the December 26, 2001, motion by Complainant regarding its response to DFC/USPS-GAN-43.

Complainant has directed a number of interrogatories to the Postal Service and to Charles Gannon who, for all times relevant to the this proceeding, served as National Team Leader/Manager of the group responsible for implementation of the service standard changes at issue.

Complainant focuses on the Postal Service's responses to two interrogatories he directed to Mr. Gannon: DFC/USPS-GAN3 and GAN-43. Both interrogatories were internally redirected from Mr. Gannon to the Postal Service for the provision of institutional responses.

In considering and implementing the service standard changes at issue in this proceeding, the Postal Service acted through its Service Standards Team, headed by Mr. Gannon. Accordingly, the Postal Service considers it appropriate to respond institutionally to certain interrogatories concerning the actions of the Team that are at issue in this proceeding. Institutional responses can be appropriate to reinforce that the decisions inquired about in an interrogatory were institutional in nature and were not the work of any particular individual -- not to shield any one individual from cross-examination, as Complainant ridiculously suggests at page 3 of his motion.

What is at issue in this proceeding is what the Postal Service -- through its Service Standards Team -- did in 2000-01. Accordingly, if Complainant wants to know the extent or degree to which such factors as “the needs of customers for two-day First-Class Mail delivery” were taken into account by Mr. Gannon and/or the rest of the Service Standards Team as they made the service standard changes at issue, Complainant can expect responses that reinforce, where appropriate, that the undertaking was a group effort, and not solely the work of Mr. Gannon or any other individual member of the Team.

The gist of Complainant’s motion appears to be that, since he directed DFC/USPS-GAN-3 and 43 to Mr. Gannon for response, he considers himself entitled to responses directly and exclusively from Mr. Gannon. What Complainant is entitled to is a responsive answer from either the Postal Service or an individual designated by the Postal Service to respond on its behalf. Complainant may have wanted the latter, but he got the former. The institutional answers at issue provide responsive information covering the entire Service Standards Team, including its leader. Complainant’s lament seems to be that he got too much information in response to DFC/USPS-GAN-3 and 43, because he only wanted to know about one member of the Team.

He does not complain that the substance of the answers that he got were non-responsive or incomplete or evasive. The only polite characterization of this controversy that the Postal Service can conceive is to call it moot and request that the motion be denied on that basis.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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.

Michael T. Tidwell

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