

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

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OCA/USPS-307  
(January 16, 2002)

In accordance with Rules 25 and 26, the Postal Service hereby belatedly objects to interrogatory OCA/USPS-307, filed on December 14, 2001, on the grounds that it does not constitute proper follow-up. That interrogatory states:

OCA/USPS-307. The following refers to the USPS response to OCA/USPS-299, dated December 10, 2001.

- (a) The Postal Service indicated its process of updating site-specific Express Mail network data to each POS One terminal including the fact that the NCR POS One system displays "a warning message for articles addressed to post office boxes that are scheduled for delivery over the weekend." When the "1-800-ASK-USPS" phones are answered and a customer asks for the delivery standards for First-Class, Priority and Express Mail, does the USPS Ask representative have information available such that they can give (1) customers "a warning message for articles addressed to post office boxes that are scheduled for delivery over the weekend;" and, (2) do USPS Ask representatives give customers the warning?
- (b) If your response to part "(a)1" of this interrogatory is other than affirmative, please explain why the USPS ASK representative does not have the information.
- (c) If your response to part "(a)2" of this interrogatory is other than affirmative, please explain why the USPS Ask representative does not provide the customer with the courtesy warning.

This interrogatory essentially "fell through the cracks" in a period when hearings were ongoing simultaneously with continued discovery upon the witnesses originally scheduled to appear in January as well as settlement discussions. When it was discovered, the answer was already overdue. Recognizing that a simple answer, if

available, might be preferred to an objection and possible subsequent motions practice, the undersigned counsel undertook to identify who on the client side had assisted in providing previous material regarding 1-800-ASK-USPS. That client was identified, and assistance was requested. However, that individual's responsibilities have recently required considerable travel, and only in the last two days has any substantive response been forthcoming. Unfortunately, that response indicates that a full answer to the question can only be provided by parsing the programming underlying resources available to those operators, which would constitute an entirely new area of inquiry.

This interrogatory does not constitute proper follow-up because a question inquiring further into the ASK operators' resources did not need to await a response identifying a warning message used by one type of POS ONE retail terminal, OCA/USPS-299. The interrogatory could easily have been posed during the scheduled period of discovery, since the response to OCA/USPS-299 simply indicated that one kind of POS ONE terminal had a warning message programmed with other retail terminals did not. As such, OCA/USPS-307 constitutes a new inquiry rather than follow-up.

An answer could be provided at this time to OCA/USPS-307, which would take the form of indicating that the warning message provided by certain POS ONE terminals would not appear to 1-800-ASK-USPS operators because they do not use those terminals. Such operators instead respond to customer inquiries regarding delivery standards by considering specific origin/destination points, date of mailing, destinating address such as a post office box, etc., with information applicable to the question posed. Were such a response actually filed, however, it could "open the door"

to a host of questions regarding the programming underlying those operators' resources. The Postal Service is not prepared to open that door at this time, especially with settlement discussions proceeding as they are. Accordingly, this objection is being filed. A motion for late acceptance accompanies this objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

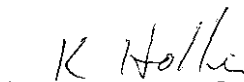
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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#### **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.



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January 16, 2002