

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS POTTER
TO INTERROGATORY OF THE OCA (OCA/USPS-T1-2)
(April 28, 2005)

The United States Postal Service hereby provides the response of witness Potter to the following interrogatory of the OCA, filed on April 14, 2005: OCA/USPS-T1-2.

The 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

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov
April 28, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Michael T. Tidwell

**RESPONSE OF USPS WITNESS POTTER
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T1-2

Please refer to your testimony at pages 6 and 7, line 23, and lines 1-5, respectively, concerning Registered Mail service.

- a. Pursuant to your directive, has postal management organized the cross-functional team to thoroughly review Registered Mail service? Please provide a copy of your directive. Also, please identify the individual in postal management who will chair or lead the team.
- b. Will the cross-functional team report the results of its review to you? If it is not you, please identify the responsible postal official or officials to whom the team will report the results of its review.
- c. Have you established a date when the cross-functional team will report the results of its review to the postal official or officials identified in part b. of this interrogatory? If so, please provide that date. If not, please explain how long you anticipated the review to take when you established the team.
- d. Has the cross-functional team begun its review of Registered Mail service? During its review, will the cross functional team meet with customers of Registered Mail service?
- e. To date, has the cross-functional team prepared any reports, workpapers, documents, or other materials in preparation for, or as part of, its review? If so, please provide those reports, workpapers, documents, or other materials.
- f. Please describe the final work product you expect the cross-functional team to provide to the postal official or officials identified in part b. of this interrogatory at the conclusion of its review? Will this work product be provided to the public?

RESPONSE:

- a. Yes. The directive was in the form of an oral communication, so no hard copy record exists. I am informed that the group is being led by Vincent DeAngelis, Manager, Value Added & Special Services. I am further informed that Mr. DeAngelis' group reports to Nicholas Barranca, Vice-President, Product Management.

**RESPONSE OF USPS WITNESS POTTER
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

Response to OCA/USPS-T1-2 continued:

- b. I do not expect the group to report directly to me. Its findings will be transmitted to senior managers in Operations, Finance and Marketing who will, in turn, inform and advise me and the rest of the headquarters senior management team.
- c. No. But, I expect the group to conclude its work in time to permit development and filing of any Registered Mail request with the Commission either before or as part of the omnibus rate case that will likely be filed in calendar year 2006.
- d. I am informed that the group has begun its work. I leave it to the discretion of the group to determine whether and, if so, how to solicit customer input.
- e. Not to my knowledge.
- f. Without a particular form of work product in mind, I want senior management to be provided with an informed basis for considering our next steps. I will leave it to others in the Postal Service to determine the extent to which any final written report from the group should become public, when such a report is produced.