

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

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF DOUGLAS F. CARLSON
(DFC/USPS-61)
(May 31, 2005)

As indicated below, the United States Postal Service hereby files its objection to the above-referenced interrogatory, filed by Mr. Carlson on May 19, 2005.

The interrogatory reads:

DFC/USPS-61. Please refer to the response to DFC/USPS-25. Please provide documents relating to a Postal Service policy or practice for retail window clerks to encourage or induce customers to use Priority Mail or Express Mail, rather than First-Class Mail or Package Services, to send items that they present to the retail window clerk for mailing. This request specifically encompasses records relating to employee training manuals, policies establishing employee sales goals or quotas, directions to employees relating to communication of service standards to customers, and documents describing sales techniques to encourage or induce customers to use Priority Mail or Express Mail, rather than First-Class Mail or Package Services, to send items that they present to the retail window clerk for mailing.

The Postal Service objects to this request on the grounds of relevance and commercial sensitivity.

In the referenced response to DFC/USPS-25, the Postal Service provided a Service Evaluation form under what is known as the "Mystery Shopper Program." It appears that Mr. Carlson is following up on questions 5 and 5a of that form, which asked the mystery shopper to indicate whether a window clerk inquired when the customer wanted an item to arrive, or offered Express Mail or Priority Mail and stated

the service standard.

Putting aside the issue of whether, as Mr. Carlson appears to suggest, providing such information to the customer amounts to a "policy or practice for retail window clerks to encourage or induce customers to use Priority Mail or Express Mail, rather than First-Class Mail or Package Services," it is clear that what he is seeking are "employee training manuals, policies establishing employee sales goals or quotas, directions to employees relating to communication of service standards to customers, and documents describing sales techniques." None of this information is even remotely relevant to any of the issues in this proceeding. Rather than addressing such matters as the value of these various services, it addresses sales policies and practices.

Moreover, under general standards of good business practice, the Postal Service does not disclose commercial information that could be used to its detriment by other actors in the same commercial markets – be they current competitors, prospective bidders, or other entities with which the Postal Service might someday do business, or against which the Postal Service might someday compete. As Priority Mail and Express Mail are products over which the Postal Service faces direct competition, any employee training manuals, established employee sales goals or quotas, directions to employees relating to communication of service standards to customers, and documents describing sales techniques are clearly commercially sensitive.

Therefore, for the reasons and on the grounds specified above, the Postal Service objects to DFC/USPS-61.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer

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.

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037, FAX: -5402
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