

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BOOKSPAN

Docket No. MC2005-3

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OCA/USPS-T2-11(c)-(d)**
(August 15, 2005)

The United States Postal Service objects to interrogatories OCA/USPS-T2-11(c) and (d), filed on August 5, 2005. The questions, which are attached, seek detailed information about International Customized Mail (ICM) agreements. The predicate for the questions is the inclusion of a reference to ICMs as part of a recitation of the witness's duties and experience in the autobiographical sketch preceding her testimony.

The questions are completely irrelevant to the issues before the Commission in this docket, which concerns the appropriateness of the rate and classification terms of a particular Negotiated Service Agreement, the one with Bookspan. The statements in the witness's testimony regarding ICMs were presented solely to describe her duties and experience and to establish her general expertise. The fact that a witness in a proceeding before the Commission has duties in areas outside of the Commission's jurisdiction cannot mean that a Commission docket can be turned into an inquiry into areas as clearly non-jurisdictional as international rates and service. The detailed information sought will shed no light on the consistency of the Bookspan NSA with the relevant policies of the Act, which is the task before the Commission in this docket. The

Bookspan NSA must be evaluated on its own merits, and not on the results—whether favorable or unfavorable—of other postal service programs.

By contrast, parts (a) and (b) of the interrogatory are arguably relevant to the purpose of an autobiographical sketch, and the Postal Service is not raising an objection to them at this time.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999, Fax -5402
scott.l.reiter@usps.gov
August 15, 2005

OCA/USPS-T2-11. Please refer to your testimony at page ii. You state that: "In 1996, I was selected as the Program Manager for International Customized Mail agreements in the newly formed International Business Unit. I was responsible for negotiation, development and implementation of ICM agreements."

- a. Please describe your duties in negotiating and implementing ICM agreements.
- b. Please give the time period during which you negotiated and implemented ICM agreements.
- c. Please state the number of ICM agreements, by year, that the Postal Service entered into during the period of time given in answer to part b. of this interrogatory. Please break down this number into:
 - i. number, or percentage, of total ICM agreements (by year) that broke even, i.e., revenues equaled costs.
 - ii. number, or percentage, of total ICM agreements (by year) that produced a surplus, i.e., revenues exceeded costs.
 - iii. number, or percentage, of total ICM agreements (by year) that lost money, i.e., costs exceeded revenues.
- d. Please list all measures used by the Postal Service to ensure revenue surpluses for ICM agreements.
 - i. How successful were these measures?
 - ii. If the measures were not entirely successful, what changes to these measures are being taken with respect to ICM agreements.

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.

Scott L. Reiter

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Washington, D.C. 20260-1137
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