

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE
TO REQUEST FOR ADMISSION OF
THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-RFA-1)

Pursuant to Commission Order No. 1210, the United States Postal Service hereby provides a compelled response to the following request for admission of the Newspaper Association of America: NAA/USPS-RFA-1, filed on February 17, 1998.

The request for admission 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


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March 26, 1998

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AMERICA

NAA/USPS-RFA-1. Please admit the existence of a document entitled "United States Postal Service 1998 Marketing Plans" of which the attached is a copy of the cover page. If you cannot completely confirm, please explain.

RESPONSE:

The Postal Service affirms that the Marketing Plan is in fact a document prepared for internal use by the Postal Service.¹ As such, the document is used to inform postal employees, particularly those in marketing, about market trends and perceptions. As an internal document, it is not only used for informational purposes, but used to exhort postal employees to improve service and promote the benefits of the services they provide.

As a general matter, the Postal Service favors growth in its core businesses, including advertising mail. To achieve that goal, the Postal Service must communicate to its internal audiences the importance of improving service, promoting ease of use, and controlling cost and rate increases. These are worthwhile goals for almost any endeavor, whether public or private. In fact, they are fully consistent with the mandate of the Postal Service set out in the opening of the Postal Reorganization Act, namely that the Postal Service "shall provide prompt, reliable, and efficient services" And if any given institution, public

¹ The Marketing Plan is a 300-plus page document of broad scope which was intended to inform and motivate an internal audience. It is not intended for external use and reliance or use of it by persons or entities outside the Postal Service could lead to misinterpretation or misuse of statements within it. As such, small pieces of it can be taken out of context and used to infer a variety of motivations on the part of the Postal Service.

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or private, succeeds in improving service and promoting ease of use, and accomplishes these objectives at a reasonable price, one can reasonably expect its constituency to recognize the value and increase its use of that institution's products and services.

The above themes can be expressed in a variety of ways. Moreover, expressions of the existence of competition or intent to compete should be understood to serve as motivational tools which recognize current market realities, and not as a battle cry against private sector providers of alternative media. Thus, any given statement in the marketing plan cannot be understood or used in isolation, but rather must be placed in the appropriate context.

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.


Anthony F. Alverdo

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