

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-141-151(a)-(b), 152-156, 158-166, AND 168-171)  
(July 17, 2006)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-141-151(a)-(b), 152-156, 158-166, and 168-171.

Each 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

---

Keith E. Weidner

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-6252, Fax -3084

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-141.** This Interrogatory relates to the \$1 credit charge that is made to validate a Change of Address Order.

- [a] Please advise how the credit card charge is processed.
- [b] What information or data is provided by the Postal Service to the credit card company?
- [c] What information or data is provided by the credit card company to the Postal Service as a result of the processing of the charge?
- [d] What use is made of the information that is provided by the credit card company to the Postal Service?
- [e] Must the name on the credit card match the name on the Change of Address Order?
- [f] If the name does not match, what action is taken by the Postal Service?
- [g] Must the billing address on the credit card match the old address on the Change of Address Order?
- [h] If the billing address does not match the old address, what action is taken by the Postal Service?
- [i] Must the billing address on the credit card match the new address on the Change of Address Order?
- [j] If the billing address does not match the new address, what action is taken by the Postal Service?
- [k] Why was the \$1 amount chosen for the credit card validation?
- [l] Could it have been more?
- [m] Could it have been less?
- [n] If a customer purchases a single one-cent postage stamp at a retail service window, may he/she use a credit or debit card to pay for the purchase?
- [o] If not, why not?

**RESPONSE:**

- (a) The charge is processed by a credit card processing company.
- (b) The card number.
- (c) Whether the card is authorized or rejected.
- (d) If the card is authorized, the Postal Service will complete the transaction.
- (e) Yes.
- (f) The Postal Service will not complete the transaction.
- (g) The billing address on the credit card must match either the old or new address.
- (h) The Postal Service will not complete the transaction.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

- (i) See the response to subpart (g).
- (j) See the response to subpart (h).
- (k) When the Change of Address service was set up, one dollar was the lowest minimum charge common to all credit cards for credit card validation.
- (l) Yes.
- (m) No.
- (n) Yes.
- (o) Not applicable.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-142.** Please refer to your response to Interrogatory DBP/USPS-98 subpart a.

[a] Please explain why the Postal Service has not worked out implementation procedures prior to submitting the proposal to the Postal Rate Commission?

[b] Please confirm, or explain if you are unable to confirm, that the implementation procedures are important to the understanding and evaluation of the proposal.

[c] Please advise when the implementation procedures will be completed?

[d] If they will not be available prior to the end of discovery, how will the participants in this Docket be able to comment on the procedures and advise the Commission on the appropriateness of the implementation procedures?

**RESPONSE:**

[a] Apart from the fact that it may in some instances be imprudent to work out implementation details on the basis of a *proposal* for, and not the *outcome* of, a rate case, internal communications and discussions among various Postal Service departments are required to develop a consensus on the best way to implement a classification change such as Priority Mail dim-weighting. Such a process can be evolutionary, and is typically not finalized at the time that the classification change is proposed to the Postal Rate Commission. Indeed, sometimes adjustments can be required even after the time of initial implementation. Consequently, the Postal Service often is not able to commit to implementation procedures at as early a stage as the filing of a proposed classification change — even if some things are known in advance.

In the case of dim-weighting, which at USPS-T-33, page 27, line 18 is described as representing somewhat of a “culture change” to the Postal Service, it is perhaps particularly important not to commit too soon to specific implementation procedures. This is suggested by the implementation experiences of Canada Post and Australia Post — discussed by those administrations with witness Scherer (USPS-T-33) — both of which were characterized by some vicissitudes. For example, in 1998, Canada Post introduced to its retail outlets a parcel measurement tool called a “cubing wheel.” The

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

device, however, turned out to be unwieldy, and in the following year Canada Post converted to simple measuring tape.

By enhancing prospects for a good solution, a flexible, open-minded approach to implementation can serve the interests of both the Postal Service and mailers.

[b] Not confirmed. The Postal Service believes that the efficacy and benefits of Priority Mail dim-weighting are amply demonstrated at USPS-T-33, pages 26 - 31, without the need for specification of implementation procedures (such as whether length, width and height measurements will be rounded to the nearest whole inch). This includes satisfaction of the classification criteria in Title 39, U.S.C., §3623(c).

[c] The answer is not known. Please see the response to subpart [a].

[d] Participants can inquire about what foreknowledge or expectations about implementation the Postal Service may have, and the Postal Service can answer such inquiries to the best of its ability. For example, in responding to DBP/USPS-98[b], the Postal Service offered that “length, width and height measurements *are likely* to be rounded in some way, possibly to the nearest whole inch.” (Italics added.)

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-143.** Please refer to your response to Interrogatory DBP/USPS-98 subpart a.

[a] Please confirm, or explain if you are unable to confirm, that if a dimension of a parcel was measured as 18-1/2 inches and it was rounded off to the nearest whole inch that the calculation would utilize 19 inches as that dimension.

[b] Will the rounding off to the nearest inch be a mandated or a permissible procedure?

[c] Is the rounding off to the nearest inch a mandated or a permissible procedure with respect to any other measurements utilized in evaluating compliance with existing requirements for letters, flats, or parcels? Please explain and discuss.

[d] Please confirm, or explain if you are unable to confirm, that if a parcel had a length, width, and height of 18-1/2 inches and rounding was not done, the dimension weight would be 33 pounds while if the 18-1/2 inches was rounded off to 19 inches the dimension weight would be 36 pounds. Similarly, if the length, width, and height were 13-1/2 inches, the dimension weight would change from 13 to 15 pounds as a result of rounding to the nearest inch.

**RESPONSE:**

[a] Confirmed.

[b] If the Postal Service does in fact round dim-weight measurements to the nearest whole inch, then that is likely to be a uniform procedure, if that is what you mean by “mandated.”

[c] No. Currently, rounding to the nearest whole inch is not done in any postal applications.

[d] Confirmed, though the calculations are dimensional weights, not “dimension weights.”

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-144.** Please refer to your response to Interrogatory DBP/USPS-93.

[a] Has that ever been the Postal Service policy?

[b] If so, please explain and discuss.

[c] Please provide and discuss the current Postal Service policy with respect to the sale of philatelic stamps, items, and products.

**RESPONSE:**

The Postal Service does not have a written policy, target markup, or return on investment goal that it applies in setting the price of such products. The price of each product is set individually based on a variety of factors, including recovery of production costs, perception of consumer interest, value to the Postal Service of the product's dissemination, and the price of similar products in the market. Of course, the face value of any postage included in the product would represent a floor beneath which the price could not go.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-145.** Please refer to your response to Interrogatory DBP/USPS-100. The referenced DMM section contains four pages. Which specific subsections of that section relate to the three specific questions that I asked in my original interrogatory?

**RESPONSE:**

Sections with particular relevance to Express Mail, or the specific questions asked, include sections 4.1(a)-(b), 4.1(d), 4.2, 4.3(f), 4.3(n), 4.3(s), 4.3(ab), and 4.3(ae).

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-146.** Please refer to your response to Interrogatory DBP/USPS-90.

[a] Please relate the details of the discussions that have taken place that you characterize as not being significant.

[b] Please provide and discuss details of any discussions, whether they are characterized as significant or not, about moving the Day 0 cutoff times and/or collection times earlier to, in effect, increase the Service Standards for First-Class Mail and/or Priority Mail by one or more days. For example, by moving the collection time on a blue collection box from 5 P.M. to 10 A.M., a letter mailed at 4 P.M. Monday will now be delivered in a neighboring town on Wednesday rather than Tuesday.

**RESPONSE:**

(a) The wording of the Postal Service's response to DBP/USPS-90 was not intended to infer that there had, necessarily, been any discussions that could even be categorized as "not being significant." It attempted to convey that there have been no efforts, discussions, plans, programs or deliberations that those who work with Service Standards at Postal Headquarters are "aware of" which have reached that level of the organization. With a national organization of hundreds of thousands of employees, it cannot be said with *absolute certainty* that such a topic has not been discussed somewhere, sometime, somehow or within some context within the "past five years" amongst individuals at some level within the organization...hence the wording of the response to DBP/USPS-90. Therefore, to clarify, the individuals currently working with Service Standards at Headquarters are unaware of any such significant, or "not significant," discussions on such a topic within the timeframe cited.

(b) The individuals who are responsible at Postal Service Headquarters for application of national standards for collection operations are not aware of any such discussions at Headquarters or at postal field offices.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-147.** Please refer to your response to Interrogatory DBP/USPS-89 subpart c. The requested chart was to include along the top of the chart the percent delivered by Day 9 and by Day 10. Please provide a chart which shows the requested data.

**RESPONSE:**

The Postal Service does not track the requested information for Day 9 and Day 10.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-148.** Please refer to your response to Interrogatory DBP/USPS-39. Please respond to the original Interrogatory. The term "educated choice" is defined as being aware of the potential for a different cost for the use of a non-flat rate box and should that cost be less than the flat rate box having a valid reason for paying the higher postage rate.

**RESPONSE:**

None of the advertising items provided in response to DBP/USPS-38 attempts to provide information that can assure that a customer has a "valid reason for paying the higher postage," should the cost of the flat-rate box happen to exceed the cost of a viable alternative. Such choices are a matter of individual customer preference, and reflect not only the cost of the flat-rate box versus the cost of alternatives, but also the value placed by the customer on non-price attributes such as convenience and ease of use. The Postal Service cannot possibly govern these choices — nor does the Postal Service presume to know better than customers what they might prefer.

Furthermore, the Postal Service believes that customers are already adequately informed about the "potential" for lower-cost alternatives to the Priority Mail flat-rate box. First, there is a disclaimer on the box saying that "other Priority Mail options may cost less." Additionally, customers generally should have a learned sense of Priority Mail rates (please see witness Scherer's response in Docket No. MC2004-2 to DBP/USPS-T1-12[a] and [b]). It would not be intuitive for customers to assume that a Priority Mail flat-rate box, at \$8.80 (proposed), is necessarily the least-cost option when Priority Mail rates start at \$4.65 (proposed). Nor would it be intuitive for customers to assume that a flat-rate box easily able to contain upwards of 5 or 10 pounds necessarily carries the lowest price possible (especially when the rate schedule starts at one pound).

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

Please see witness Scherer's response to Docket No. MC2004-2, DBP/USPS-  
T2-11[i], redirected from witness Barrett.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-149.** Please refer to your response to Interrogatory DBP/USPS-37.

[a] Please furnish copies of any guidelines that are furnished to acceptance clerks which will enable them to fairly evaluate the provisions of DMM Section 101.1.2 to determine the proper implantation of the nonmachinable surcharge in general and specifically to the mailpiece that was described in the original interrogatory.

[b] Please indicate why a cloth-type bow that created a bump that was only 0.07 inches high would be equated with the specific items that are enumerated in subsection d of DMM Section 101.1.2 to cause the mailpiece to be considered uneven and therefore subject to the nonmachinable surcharge.

[c] Please confirm, or explain if you are unable to confirm, that the mailing of a key that is not loose or a coin that is not loose will not require, in and of itself, the payment of the nonmachinable surcharge.

[d] Please confirm, or explain if you are unable to confirm, that the operative word in subsection d of DMM Section 101.1.2 are the specific items such as pens, pencils, or loose keys or coins and not the word uneven. In other words, just because the mailpiece is uneven, does not, in and of itself, mandate the surcharge.

[e] If a piece of tape is placed over a clasp on an envelope, is the nonmachinable surcharge still mandated?

[f] If so, please explain.

**RESPONSE:**

(a) Postal acceptance clerks are provided no guidelines regarding any form of implantation.

(b) The response to DBP/USPS-37 indicated that the determination of whether a mailpiece with a “bump” such as the one imagined in the question was “basically flat” would best be made by an actual acceptance clerk examining an actual mailpiece. It is not reasonable to expect the Postal Service to provide a technical evaluation on all mailpieces that exist only as figment of people’s imaginations.

(c) Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

- (d) The Postal Service regards all of the word in that provision to be operative. The provision lists items that could cause a mailpiece to have a characteristic that triggers the application of the surcharge.
- (e) – (f) The determination of whether placement of tape over a clasp a “cures” the nonmachinability of a mailpiece could depend on a combination of the nature of the clasp, the nature of the tape, and the manner in which the tape is affixed. None of these factors can be judged in the abstract. Accordingly, to repeat: such determinations are best made by actual acceptance clerks examining actual mailpieces. It is not reasonable to expect the Postal Service to provide a technical evaluation on all mailpieces that exist only as figment of people’s imaginations.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-150.** Please refer to your response to Interrogatory DBP/USPS-27 and 30.

[a] Please provide copies of any updates to the August 30, 2005 letter. Please provide the current listing of those categories of Express Mail that are ineligible for refunds of postage for failure to meet service standards.

[b] Please provide an updated listing of all of the offices to which Express Mail may not be sent.

**RESPONSE:**

(a) – (b) As the response to DBP/USPS-27 indicates, updates to the letter of August 30, 2005 were made on USPS.com as conditions changed. For a current listing of those offices in which there is an Express Mail embargo, see the National Mail Service Updates page on USPS.com. An embargo of Express Mail to a destination means that the Postal Service will not accept Express Mail for delivery to those destinations.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-151.**

[a] Please provide me a listing of the percentage of the retail service windows that are open on Saturday countrywide as well as a separate listing broken out by District.

[b] Please provide me a listing of the percentage of the post office box lobbies that are open on Saturday countrywide as well as a separate listing broken out by District.

[c] Please provide the criteria that are considered for the establishment of Saturday post office lobby hours at a particular facility.

[d] Please provide the criteria that are considered for the establishment of Saturday retail window service hours at a particular facility.

**RESPONSE:**

(a) - (b) This information is not available.

(c) - (d) Objections filed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-152.** Please refer to your response to Interrogatory DBP/USPS-22 subpart b. Please advise if the words "post office is closed" refer to the retail service windows or the post office box lobbies or both.

**RESPONSE:**

Both.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-153.** Please confirm, or explain if you are unable to confirm, that city delivery carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

**RESPONSE:**

City delivery carriers do not deliver out of all offices. At all offices from which they do, city carriers deliver six days a week, Monday through Saturday, except for national holidays, and in cases where catastrophic occurrences prevent delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-154.** Please confirm, or explain and attempt to quantify the extent to which there is less than six day delivery if you are unable to confirm, that rural route carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

**RESPONSE:**

Rural route carriers do not provide delivery from all offices. For those offices from which they do, rural carriers provide service at all offices six days a week, Monday through Saturday, except for national holidays, and in cases where catastrophic occurrences prevent delivery, with the exception of a minute number of rural routes. On some of these rural routes (approximately ten in the entire country), delivery is completed six days a week but on three days one area is serviced and on the other three days the remainder of the route is serviced. There are also approximately five rural routes in the country that only provide service three days a week.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-155.** Please confirm, or explain and attempt to quantify the extent to which there is less than six day delivery if you are unable to confirm, that highway contract route carriers provide delivery service on six days a week, Monday through Saturday except for national holidays, at all offices.

**RESPONSE:**

Highway contract route carriers do not provide service from all offices. For those offices from which they do, they provide service six days a week, Monday through Saturday, except for national holidays, and in cases where catastrophic occurrences prevent delivery, and for a very small number of highway contract routes that deliver less than six days a week because of their contract service agreements with the Postal Service.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-156.** Please refer to your response to Interrogatory DBP/USPS-22 subparts c through h. Please explain how post office box service can be considered a premium service when the service at certain facilities is only provided five days a week while city delivery service at a the same post office is provided six days a week.

**RESPONSE:**

See witness Kaneer's response to DFC/USPS-T41-8.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-158.** Please refer to your response to Interrogatory DBP/USPS-23 subpart c. Please advise what in my original interrogatory has caused the Postal Service not to be able to confirm my request. The original question stated in a different manner [with dates and times] is as follows: At a post office with a posted up-time of 10 AM, an EXFC Reporter collects the mail at 11 AM on Monday. At 12 Noon on Monday a letter is placed into the Reporter's box and collected by the Reporter at 11 AM on Tuesday. The letter is reported as having been delivered on Tuesday.

**RESPONSE:**

The Postal Service was unable to confirm DBP/USPS-23(c) because the original question was worded in a confusing manner. The answer to this interrogatory is "Confirmed."

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-159.** Please refer to your response to Interrogatory DBP/USPS-23.

[a] Please advise why the reference to Express Mail is limited to guaranteed next-day delivery as opposed to indicating that it may not be guaranteed for later than next-day.

[b] Please advise why the reference to Priority Mail does not indicate may also be delivered overnight.

[c] Please confirm, or explain if you are unable to confirm, that by not indicating that some Priority Mail is delivered overnight may cause some customers to utilize Express Mail unnecessarily.

[d] Please confirm, or explain if you are unable to confirm, that the Postal Service will correct these two items as noted above and also in the response to the original subpart b.

**RESPONSE:**

(a) - (d) We assume that this question is a follow-up to the Postal Service's response to DBP/USPS-25 rather than DBP/USPS-23. The "Express Mail vs. Priority Mail" script reflects the fact that Express Mail is a predominantly overnight product, while Priority Mail is a predominantly 2-3 day product. The script is neither designed nor intended to be a comprehensive overview of those two products. No revisions to the script will be made because there is no demonstrated need to do so. As for the "Priority Mail" script, revisions are under consideration.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-160.** Please refer to the response to Interrogatory DBP/USPS-28 subparts a and c.

[a] How frequently are updates to this listing made?

[b] Please provide an updated listing if available.

**RESPONSE:**

(a) The directories are updated approximately every two months.

(b) See the attached Excel spreadsheet.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-161.** Please refer to the response to Interrogatory DBP/USPS-31. Your response refers to service related to domestic destinations within the 969 ZIP Code.

[a] Please discuss the ability to achieve Express Mail delivery when the effects of the International Dateline are not considered.

[b] For example, confirm, or explain if you are unable to confirm, that an Express Mail article that does not cross the International Dateline [is mailed and destined for delivery on the same side of the Line] on a Monday prior to the cut-off time will be guaranteed for delivery on either Tuesday or Wednesday.

[c] Furthermore, an Express Mail article mailed on the 48-states side of the International Dateline and destined for an area on the Guam side of the International Dateline on a Monday prior to the cut-off time will be guaranteed for delivery on either Wednesday or Thursday [local day at the point of delivery].

[d] Furthermore, an Express Mail article mailed in the opposite direction as noted in subpart c above will be guaranteed for delivery on either Monday or Tuesday [local day at the point of delivery].

**RESPONSE:**

This response assumes, as the original interrogatory does, that no holidays are involved.

(a) – (b) Confirmed that an Express Mail piece entered on a Monday prior to the cut-off time that does not cross the International Dateline will be guaranteed for delivery on either Tuesday or Wednesday.

(c) Confirmed that an Express Mail piece entered on a Monday prior to the cut-off time in the 48 States that crosses the International Dateline going westbound will be guaranteed for delivery on either Wednesday or Thursday.

(d) Not confirmed. An Express Mail piece entered on a Monday prior to the cut-off time in Guam that crosses the International Dateline going eastbound will be guaranteed for delivery on either Tuesday or Wednesday.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-162.** Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on the day prior to one non-delivery day [prior to the cut-off time] such as on a Saturday prior to a Sunday [or the day prior to a holiday such as July 3, 2006], will be guaranteed for delivery on either Sunday [if the delivery ZIP Code is on the list and transportation is available] or no later than Monday. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

**RESPONSE:**

Assuming, as the question does, that Monday is not a holiday, then a piece entered on a Saturday prior to the cut-off time would be guaranteed for delivery on either Sunday or Monday, depending on the origin and destination.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-163.** Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on two days prior to one non-delivery day [prior to the cut-off time] such as on a Friday prior to a Sunday [or two days prior to a holiday such as November 21, 2006], will be guaranteed for delivery on either Saturday or Sunday if the delivery ZIP Code is on the list or Monday. if the delivery ZIP Code is not on the list. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

**RESPONSE:**

Assuming, as the question does, that Monday is not a holiday, then a piece entered on Friday prior to the cut-off time would be guaranteed for delivery on either Saturday, Sunday, or Monday, depending on the origin and destination.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-164.** Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed on the day prior to two consecutive non-delivery days [prior to the cut-off time] such as on a Saturday prior to a Monday holiday will be guaranteed for delivery on either Sunday or Monday if the delivery ZIP Code is on the list or Tuesday if the delivery ZIP Code is not on the list. Any effect of the International Dateline will be as noted in response to Interrogatory DBP/USPS-161.

**RESPONSE:**

A piece entered on a Saturday prior to the cut-off time when Monday is a holiday would be guaranteed for delivery on either Sunday, Monday, or Tuesday, depending on the origin and destination.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-165.** Please confirm, or explain if you are unable to confirm, that an Express Mail article which is mailed after the cut-off time will be guaranteed for delivery no later than it would be guaranteed if it was mailed prior to the cut-off time on the next business day.

**RESPONSE:**

In some instances a piece entered after the cut-off time may receive a delivery guarantee by the retail computers for later in the day of delivery than a piece entered the following morning (e.g., a piece entered after the cut-off time may receive a 3 PM commitment in situations where the piece entered the next morning would receive a Noon commitment). The Postal Service is currently in the process of adjusting the retail computer logic to deal with these infrequent situations.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-166.**

[a] Please discuss and explain any restrictions or criteria considered with respect to the setting of a cut-off time at a specific acceptance point. Please distinguish between overnight vs. non-overnight guarantees and the relationship of the cut-off time to the retail window service hours or day of the week.

[b] If an office is permitted to establish a cut-off time prior to the opening of the retail service window hours - such as a cut-off at 7 AM and the window doesn't open until 8 AM, how can a mailer deposit Express Mail that day?

**RESPONSE:**

(a) The cutoff times at individual acceptance units are set by officials in the field, and are generally designed to connect with a planned set of dispatches necessary to meet the delivery guarantee.

(b) A mailer can deposit Express Mail whenever an office is open.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-168.** Please advise all instances where postage stamps have been sold at a value which is more or less than the value imprinted on the stamp. Please identify the stamp and include the date of issue, description of the stamp, the value imprinted on the stamp, the price for which it was sold, and the reasons for the difference in price.

**RESPONSE:**

The Postal Service Guide to U.S. Stamps lists all of the stamps ever printed. It includes date of issue, image of the stamp, and the value on the stamp. The price at which stamps were sold can be found in the Postal Bulletin. The stated comparison can be made using these sources, although the Postal Service has not sold stamps alone at more than face value. In one instance, in 2005, certain stamps commemorating Lewis and Clark were issued as part of a "prestige booklet." The value of the stamps was \$7.40 and the book sold for \$8.95. The difference represented the price of the book.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-169.** Please advise all instances where postal/stamped cards have been sold at a value which is more or less than the value imprinted on the stamp or that value plus a maximum of two cents. Please identify the card and include the date of issue, description of the card, the value imprinted on the card, the price for which it was sold, and the reasons for the difference in price.

**RESPONSE:**

The Postal Service Guide to U.S. Stamps and the Postal Bulletin list these products as well. Numerous philatelic post card issuances since 1994 have been priced higher, although standard stamped cards at the rate of postage plus the stamped card fee have always made available as well. The higher-priced cards are offered purely as an option for those who find additional value in the designs; the additional revenue is used to support the philatelic products program.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-170.** Please advise all instances where stamped stationery/envelopes have been sold at a value which is more or less than the value imprinted on the stamp or that value plus a maximum of eight cents. Please identify the item and include the date of issue, description of the item, the value imprinted on the item, the price for which it was sold, and the reasons for the difference in price.

**RESPONSE:**

The Postal Service Guide to U.S. Stamps and the Postal Bulletin contain this information as well. If your question is whether any stamped envelopes have been sold for more than the postage value plus the prevailing fee for stamped envelopes, the Postal Service has not done so. Regarding the basis of the price for stamped stationery, please see Docket No. C2004-3.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-171.** Please describe and identify any stamps, cards, envelopes, stationery, etc. that have been issued by the United States Postal Service and/or Post Office Department that are no longer valid for use. Please provide the reason for the invalidation.

**RESPONSE:**

The Postal Service is not aware of any invalidation of postage.