

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-365 THROUGH 369, 376 THROUGH 378 AND 415)
(August 8, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatories:

DBP/USPS-365 through 369, filed July 19, 2006; and

DBP/USPS-376 through 378 and 415, filed on July 24, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-365. What is the significance of the word "Topic" that is part of the words "Market Research Briefing - Topic" appearing on the lower left corner of the initial pages 1 through 11 of USPS LR-L-152?

RESPONSE

There is none.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-366.

[a] Assume that the rates and changes proposed in this Docket have been implemented, may the mailer of a one ounce First-Class Mail flat utilize a Forever Stamp and a regular 20¢ stamp to fully pay the postage?

[b] If not, why not?

RESPONSE

[a] Yes, because in this case the purchase price of the Forever Stamp will be equal to the “forever value” (both 42¢). Please see the responses to DBP/USPS-340 and DBP/USPS-341.

[b] Not applicable.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-367. Assume that the rates and changes proposed in this Docket have been implemented and further assume that a mailer deposits two, one ounce First-Class Mail articles that require postage at the flat rate of postage [62¢] either because the piece exceeds the dimensions for a letter or the mailpiece has one of the non-machinable characteristics. One of the articles has the postage paid with a Forever Stamp and the second article has the postage paid with a regular, denominated 42¢ stamp.

- [a] Will both articles be treated in the same manner with respect to either being returned for additional postage and/or collection of postage due upon delivery?
- [b] Please advise what action will be taken on these two mailpieces.
- [c] Please provide the rationale for your responses to subparts a and b.

RESPONSE

- [a] Yes; please see the response to DBP/USPS-366.
- [b] Please see the response to DBP/USPS-316
- [c] Please see the responses to DBP/USPS-366 and DBP/USPS-316, respectively.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-368.

- [a] Assume that the rates and changes proposed in this Docket have been implemented, may the mailer of a one ounce First-Class Mail parcel utilize a Forever Stamp and regular stamps totaling 58¢ to fully pay the postage?
- [b] May the mailer utilize two Forever Stamps and 16¢ in regular postage to fully pay the postage?
- [c] If not, why not?

RESPONSE

- [a] Yes, because in this case the purchase price of the Forever Stamp will be equal to the “forever value” (both 42¢). Please see the responses to DBP/USPS-340 and DBP/USPS-341.
- [b] Yes, because in this case the purchase price of two Forever Stamps will be equal to twice the “forever value” (both 84¢). Please see the responses to DBP/USPS-340 and DBP/USPS-341.
- [c] Not applicable.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-369. If the response to subpart a of any or all of Interrogatories DBP/USPS-366 through DBP/USPS-368 and/or subpart b of Interrogatory DBP/USPS-368 is no, please confirm, or explain if you are unable to confirm, that this will introduce a added level of confusion with respect to the utilization of the Forever Stamp.

RESPONSE

| Not applicable.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-376 Please refer to your response to Interrogatory DBP/USPS-149 subpart a. [a] Please confirm, or explain if you are unable to confirm, that the only guidelines that are provided to the postal acceptance clerks is the appropriate section of the Domestic Mail Manual. [b] Please confirm, or explain if you are unable to confirm, that by not having guidelines it can lead to uneven application of the requirements.

RESPONSE

- (a) Not confirmed. Clerks also have available the attached guide and the Notice 3A referenced in response to DBP/USPS-11.

- (b) The Postal Service agrees that a complete absence of guidelines can lead to uneven application of requirements.

Nonmachinable Surcharge For First-Class Mail and Standard Mail

Updated June 2005

First-Class Mail

The nonmachinable surcharge applies to:

- First-Class Mail® single-piece and Presorted rate letters 1 ounce or less that meet one or more of the criteria in DMM 201.2.1 (see criteria below).
- First-Class Mail single-piece, Presorted, automation rate flats, and parcels that weigh 1 ounce or less if any one of the following applies:
 - a. The piece is greater than 1/4 inch thick.
 - b. The length is more than 11-1/2 inches or the height is more than 6-1/8 inches.
 - c. The aspect ratio (length divided by height is less than 1.3 or more than 2.5).
- The nonmachinable surcharge also applies to letter-size pieces that weigh 1 ounce or less for which the mailer has chosen the MANUAL ONLY (do not automate) option. For card-rate pieces and pieces weighing over 1 ounce, a mailer can specify manual handling but will not be assessed the nonmachinable surcharge.

The nonmachinable surcharge does not apply to:

- First-Class Mail card-rate pieces.
- First-Class Mail weighing over 1 ounce.
- First-Class Mail automation-rate letters.

Standard Mail

The nonmachinable surcharge applies to:

- Standard Mail® Presorted rate letter-size pieces (including cards) that weigh 3.3 ounces or less and meet one or more of the criteria in DMM 201.2.1 (see criteria listed below).
- The nonmachinable surcharge also applies to letter-size pieces that weigh 3.3 ounces or less for which the mailer has chosen the MANUAL ONLY (do not automate) option.

The nonmachinable surcharge does not apply to:

- Standard Mail nonletters (flats and parcels). The Standard Mail rate structure includes separate rates for letters and nonletters that factors in the extra cost of handling nonmachinable letters.
- Standard Mail pieces mailed at any ECR rate or automation rate.
- Standard Mail pieces weighing over 3.3 ounces.
- Customized MarketMail®

Nonmachinable Criteria

A letter-size piece is nonmachinable if it has one or more of the following characteristics (see DMM 601.1.4 to determine the length, height, top, and bottom of a mailpiece):

- a. Has an aspect ratio (length divided by height) of less than 1.3 or more than 2.5.
- b. Is polybagged, polywrapped, or enclosed in any plastic material.
- c. Has clasps, strings, buttons, or similar closure devices.
- d. Contains items such as pens, pencils, or loose keys or coins that cause the thickness of the mailpiece to be uneven (see DMM 601.11.18).
- e. Is too rigid (does not bend easily when subjected to a transport belt tension of 40 pounds around an 11-inch diameter turn).
- f. For pieces more than 4-1/4 inches high or 6 inches long, the thickness is less than 0.009 inch.
- g. Has a delivery address parallel to the shorter dimension of the mailpiece.
- h. Self-mailers with a folded edge perpendicular to the address if the piece is not folded and secured according to DMM 201.3.13.2.
- i. Booklet-type pieces with the bound edge (spine) along the shorter dimension of the piece or at the top, regardless of the use of tabs, wafer seals, or other fasteners.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-377 Please refer to your response to Interrogatory DBP/USPS-149 subpart d.

[a] Please confirm, or explain if you are unable to confirm, that the Postal Service does not apply a literal interpretation of charging the nonmachinable surcharge just because the mailpiece is uneven such as may be caused by affixing a label to the envelope or by having an enclosure that does not occupy the full shape of the envelope but will apply the surcharge if the mailpiece is uneven when caused by items such as pens, pencils, or loose keys or coins.

[b] How is a mailer aware of this policy?

RESPONSE

- (a) The Postal Service can never be sure what you might perceive to be a “literal” interpretation of its regulations. Accordingly, the Postal Service will refrain from engaging in debates about whether one or more interpretations you put forth is “literal.” The DMM nonmachinable surcharge regulations do not contain any “just because” language in reference to mailing labels. Nor is there a requirement that an enclosure occupy exactly 100.0000000 percent of an envelope.
- (b) By reading the Domestic Mail Manual and/or conferring with ever helpful and informative postal window service personnel.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-378 Please refer to your response to Interrogatory DBP/USPS-149 subparts e and f. Assume that a mailpiece is a standard 6- by 9-inch kraft envelope with a metal clasp. Does the nonmachinable surcharge apply to this mailpiece because of the unevenness caused by the thickness of the physical clasp and/or the ability of the clasp to catch on something else and/or the rigidity caused by the metal clasp and/or another reason [please provide]?

RESPONSE

Yes.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-415 Please refer to your response to Interrogatory DBP/USPS-214. Please describe in detail the method by which a mailer, utilizing just a scale and a ruler, will be able to determine the thickness of a mailpiece which does not have a uniform thickness throughout the entire area of the mailpiece and also which has a thickness which depends on the extent to which the thickness may be compressed or which expands after compression is released. If the determination of the thickness of the mailpiece will require any additional equipment besides the scale and ruler, so indicate.

RESPONSE

Scales are used to measure the weight of mail pieces, not thickness.

Using their innate abilities, customers utilizing a ruler to measure the thickness of a mail piece need only take care to measure the piece at what appears to be its thickest point. Measurement should be made without compressing a mail piece in order to avoid the variation that can result from such compression. Should they have any questions or doubts, they can always seek the assistance of a postal service window clerk.