

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-419-429, 430(c)-434)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin, filed on July 31, 2006: DBP/USPS-419-429, 430(c)-434. An objection to 430(a) & (b) was filed on August 17, 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 B. POPKIN

DBP/USPS-419 Please refer to your response to Interrogatory DBP/USPS-217. Since you have indicated that revising the DMM is an ongoing process, please advise the present status and provide copies of any existing documentation.

RESPONSE:

The Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38.

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

DBP/USPS-420 Please refer to your response to Interrogatory DBP/USPS-218. Please confirm, or explain if you are unable to confirm, that under the present regulations, any single-piece mailing may have the postage partially paid by any combination of a postage meter stamp and any other means, including, but not limited to regular postage stamps.

RESPONSE:

The Postal Service is no longer planning to restrict postage payment methods for BPM.

Please see USPS-T-38, at 6, footnote 2, filed on August 10, 2006.

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

DBP/USPS-421 Please refer to your response to Interrogatory DBP/USPS-220 subpart c.

[a] Please discuss any minimum quantity requirements that exist for a mailer to qualify to be able to mail Periodicals.

[b] Please discuss how frequently and under what conditions a mailer will actually mail a single mailpiece in a mailing of Periodicals.

[c] Please advise the postage rate that would apply for the mailing of a single Periodical. Please assume whatever criteria are necessary to respond to this question.

[d] Please provide details of any mailing of a single Periodical where the cost of mailing the Periodical mailpiece would cost more to mail as a Periodical than it would at the single-piece First-Class Mail/Priority Mail rate.

RESPONSE:

Please see the response to DBP/USPS-420.

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

DBP/USPS-422 Please refer to your response to Interrogatory DBP/USPS-221. Assume a mailer has a single-piece retail parcel that qualifies for mailing as Bound Printed Matter and is being sent to the 8th Zone and has a weight of 5-pounds and is mailed under the present regulations.

[a] Please confirm, or explain if you are unable to confirm, that the postage for this mailpiece under the present rates is \$4.23.

[b] Please confirm, or explain if you are unable to confirm, that mailer A could prepare this mailing and pay the postage by means of a postage meter [such as those that are provided by Pitney Bowes].

[c] Please confirm, or explain if you are unable to confirm, that mailer B could prepare this mailing and pay the postage by means of a \$4.23 stamp obtained from an Automated Postal Center [APC].

[d] Please confirm, or explain if you are unable to confirm, that mailer C could prepare this mailing and pay the postage by means of a \$4.23 worth of customer-generated computer postage [it may be necessary to overpay the postage since these stamps are only available in specific values].

[e] Please confirm, or explain if you are unable to confirm, that mailer D could prepare this mailing and pay the postage by means of a \$4.23 worth of regular adhesive postage stamps.

[f] Please confirm, or explain if you are unable to confirm, that mailer E could prepare this mailing and pay the postage by means of a \$4.23 worth of regular adhesive postage stamps which he/she then "canceled" with a Mailer's Postmark Permit.

[g] Assume that mailers A, B, C, D, and E each present their mailpiece to a retail window clerk. Please confirm, or explain if you are unable to confirm, that the action taken by the retail window clerk as well as any other postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that the retail window clerk or other postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[h] Please discuss whether, in general, postage stamps on mailpieces handed over a retail service window should be cancelled by the window clerk or should they be cancelled at the processing center.

[i] Assume that mailers A, B, C, D, and E each deposit their mailpiece in the APC or other lobby drop. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[j] Assume that mailers A, B, C, D, and E each deposit their mailpiece in a blue collection box. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

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RESPONSE:

Please see the response to DBP/USPS-420.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-423 Please refer to your response to Interrogatory DBP/USPS-224.

[a] Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their rural delivery letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

[b] Will the mailer be able to give the mailpiece to the rural delivery carrier unstamped and give the carrier money to pay for the postage under the present regulations? Please explain.

[c] Will the mailer be able to give the mailpiece to the rural delivery carrier unstamped and give the carrier money to pay for the postage under the proposed regulations? Please explain.

RESPONSE:

Please see the response to DBP/USPS-420.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-424 Please refer to your response to Interrogatory DBP/USPS-225. Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their city delivery letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

RESPONSE:

Please see the response to DBP/USPS-420.

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DBP/USPS-425 Please refer to your response to Interrogatory DBP/USPS-226. Assume that mailers A, B, C, D, and E [referenced in Interrogatory DBP/USPS-422] each deposit their mailpiece [referenced in Interrogatory DBP/USPS-422] with their highway contract delivery letter carrier. Please confirm, or explain if you are unable to confirm, that the action taken by any postal employee processing the mailpieces will be identical in all five scenarios [mailers A, B, C, D, and E] except that a postal employee will have to cancel the stamps on the parcel submitted by mailer D.

RESPONSE:

Please see the response to DBP/USPS-420.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-426 Please refer to your response to Interrogatory DBP/USPS-227 subparts c, d, and e. I am somewhat confused with your responses. If the window clerk makes an evaluation of the mailpiece that the mailer hands to them over the window as contemplated by subpart e, then wouldn't that evaluation have to be performed while the customer was still at the window in case the evaluation disclosed a question with the mailpiece? Please explain.

RESPONSE:

Please see the response to DBP/USPS-419.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-427 Please refer to your response to Interrogatory DBP/USPS-227. Please confirm, or explain if you are unable to confirm, that the thrust of the Postal Service's proposed rule change is with the requirement for the window clerk to be able to offer Bound Printed Matter to a mailer rather than the ability to just accept a Bound Printed Mail article that has already been prepared that way.

RESPONSE:

Confirmed.

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

DBP/USPS-428 Please refer to your response to Interrogatory DBP/USPS-227. Please advise the training that is provided to retail window clerks to evaluate the service desired by a customer who presents a mailpiece and determines what options that are available and the prices and service standards that are associated with that service. Please provide copies of any training manuals.

RESPONSE:

Please see the response to DBP/USPS-419.

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

DBP/USPS-429 Please refer to your response to Interrogatory DBP/USPS-227.

[a] Please provide a listing of all of the retail services that a mailer of a 10-ounce mailpiece may utilize.

[b] Please discuss the exchange that would take place between the mailer and the window clerk to determine the most appropriate service for that mailpiece.

[c] Please provide copies of the POS terminal screens that would appear both for the window clerk and for the customer at each point in this exchange until it is completed and the piece is mailed.

[d] Please provide similar exchanges and computer screens for other methods of retail window acceptance besides the POS terminal.

Please provide copies of any training manuals.

RESPONSE:

Please see the response to DBP/USPS-419.

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RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-430 Please refer to your response to Interrogatory DBP/USPS-234.

[a] Please confirm, or explain if you are unable to confirm, that DMM Section 163 has six pages which refer to the Rates and Eligibility of Bound Printed Matter and another six pages of DMM Section 173 which refer to the Rates and Eligibility of Media Mail.

[b] Please confirm, or explain if you are unable to confirm, that the similar sections for Express Mail [DMM 113] is 7 pages, Priority Mail [DMM 123] is 4 pages, First-Class Mail [DMM 133] is 5 pages, and Parcel Post [DMM 153] is ten pages.

[c] Please confirm, or explain if you are unable to confirm, that if a window clerk, after determining the contents of a mailpiece determines that it eligible for both Bound Printed Matter and Media Mail is able to present three prices to the mailer and advise them that they all have the same service standards and the mailer will be able to choose the cheapest option of the three [BPM/Media/Parcel Post]. This assumes that the mailer does not need the expedited service of First-Class Mail/Priority Mail/Express Mail.

RESPONSE:

(a) & (b) Objection filed.

(c) Confirmed for POS ONE. For IRT's, only one rate is displayed at a time, depending on which service the retail associate selects.

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

DBP/USPS-431 Please refer to your response to Interrogatory DBP/USPS-236. Please confirm, or explain if you are unable to confirm, that in order to mail a single-piece Periodical that the mailer must have previously entered the publication as a Periodical and pay the appropriate fee. Please provide copies of any training manuals.

RESPONSE:

Please see the response to DBP/USPS-419.

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TO INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-432 Please refer to your response to Interrogatory DBP/USPS-236.

[a] Please provide a listing of all types of single-piece mailings [that may be made by any individual and not requiring any specific permit or authorization] which under the present regulations, the postage may not be paid by means of postage stamps.

[b] Under the proposed regulations will there be any types of single-piece mailings [that may be made by any individual and not requiring any specific permit or authorization], other than Bound Printed Matter, where the postage may not be paid by means of postage stamps?

[c] Please provide a listing of all types of single-piece mailings [that may be made by any individual and not requiring any specific permit or authorization] which under previous regulations, the postage could not be paid by means of postage stamps.

RESPONSE:

Please see the response to DBP/USPS-420.

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

DBP/USPS-433 Please refer to your response to Interrogatory DBP/USPS-237.

[a] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased postage stamps and have them available to use for future mailings of any type of mailing for which stamps are authorized.

[b] Please advise all of the classes of mail besides single-piece Bound Printed Matter that postage stamps may be utilized for paying the postage.

[c] Please advise all of the places that a customer may obtain postage stamps.

[d] Please explain why a mailer who has already purchased the stamps in a previous transaction may not mail a single-piece Bound Printed Matter article in any place that a mailer who happens to have a postage meter to utilize for the postage.

[e] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased precancelled postage stamps and have them available to use for future mailings of any type of mailing for which precancelled stamps are authorized.

[f] Please advise all of the classes of mail besides single-piece Bound Printed Matter that precancelled postage stamps may be utilized for paying the postage.

[g] Please confirm, or explain if you are unable to confirm, that many mailers have already purchased customer-generated computer postage stamps and have them available to use for future mailings of any type of mailing for which stamps are authorized.

[h] Under the proposed regulations, may the mailer of a single-piece Bound Printed Matter article utilize stamps that have been cancelled by a Mailer's Postmark Permit?

[i] If not, why not?

RESPONSE:

Please see the response to DBP/USPS-420.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-434 Please refer to your response to Interrogatory DBP/USPS-237. Please confirm, or explain if you are unable to confirm, that the thrust of the Postal Service's proposed rule change is to eliminate methods of postage payments that require a retail window sale of postage stamps rather than the acceptance of the mail by a retail window clerk or any other means by which a mailer could deposit the mail if it had the postage paid by a means that did not at some point in time require a retail window sale such as a postage meter.

RESPONSE:

Please see the response to DBP/USPS-420.