

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DREW MITCHUM (OCA/USPS-T40-20-28  
(June 6, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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Shelley S. Dreifuss  
Director  
Office of the Consumer Advocate

Kenneth E. Richardson  
Attorney

901 New York Avenue, NW Suite 200  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6891  
e-mail: [richardsonke@prc.gov](mailto:richardsonke@prc.gov)

OCA/USPS-T40-20. This interrogatory seeks information on the uses of Confirm information by the Postal Service. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 29, where it states “Preshipment notification enables the Postal Service to use Confirm information to measure, diagnose, monitor, and improve mail processing and delivery service performance.”

- a. Please explain how the preshipment notification “enables the Postal Service to use Confirm information to measure, diagnose, monitor, [or] improve” 1) mail processing or 2) delivery service performance. Please describe and explain the actions taken (if any) and the results achieved (if any) to improve mail processing and delivery service performance as a result of any preshipment notification(s). If no actions have been taken, please discuss the reasons.
- b. Please provide any reports, studies, analysis or other documents in the Postal Service’s possession involving Confirm information that were used by the Postal Service to measure, diagnose, monitor, or improve 1) mail processing or 2) delivery service performance. Please describe and explain the actions taken (if any) and the results achieved (if any) to improve mail processing and delivery service performance as a result of these reports, studies, analysis or other documents. If no actions have been taken, please discuss the reasons.

OCA/USPS-T40-21. This interrogatory seeks information on the uses of Confirm information by the Postal Service. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 29, where it states “Preshipment notification enables the

Postal Service to use Confirm information to measure, diagnose, monitor, and improve mail processing and delivery service performance.”

- a. Please confirm that the Postal Service is proposing to eliminate from section 991.31 of the Domestic Mail Classification Schedule (DMCS) the requirement that mailers provide “electronic notice of entering Confirm prior to or contemporaneous with mail entry.” If you not confirm, please explain.
- b. Given the importance of preshipment notification to the Postal Service to “measure, diagnose, monitor, and improve mail processing and delivery service performance,” please explain why the Postal Service is proposing to eliminate the requirement of prior electronic notice from section 991.31 of the DMCS.
- c. Please explain what the Postal Service intends to use as a substitute for preshipment notification to enable “the Postal Service to use Confirm information to measure, diagnose, monitor, and improve mail processing and delivery service performance.”

OCA/USPS-T40-22. This interrogatory seeks information on the uses of Confirm information by the Postal Service. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 38, where it states

“A Postal Servicerepresentative scans the Shipment ID barcode with a hand-held scanner at the point when the Postal Servicetakes final possession of the confirm mail shipment—prior to inducting the shipment into the mail processing stream. This entry scan serves to “start the clock” on Confirm mail and generates entry scan data.”

- a. Please confirm that the Shipment ID barcode for a Confirm mailing is to be provided on PS Form 8125 by Standard mailers, and PS Form 3152-A by First-Class mailers. If you do not confirm, please explain.
- b. Please identify and describe means and methods other than PS Form 8125 and PS Form 3152-A that may be used by First-Class and Standard mailers, respectively, to provide the Shipment ID barcode.
- c. Please discuss 1) why First-Class and Standard mailers would or would not choose to provide Shipment ID barcodes on the forms identified in subpart a., above, versus the means and methods identified in subpart b., above; and 2) the Postal Service's preferred method, either the forms identified in subpart a., above, or the means and methods identified in subpart b., above.
- d. Please provide 1) the number of First-Class and Standard mailers that provide Shipment ID barcodes on PS Form 8125 and PS Form 3152-A, respectively; and, 2) the number of First-Class and Standard mailers that provide Shipment ID barcodes by means and methods identified in subpart b., above.

OCA/USPS-T40-23. This interrogatory seeks information on the uses of Confirm information by the Postal Service. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 15, where it states

[PS Form 8125 or PS Form 3152-A] accompanies the shipment to its drop site, where Postal Service personnel scan the barcode on the form. For Destination Confirm shipments, the Postal Service's scanning of the Shipment ID barcode on the induction form "starts the clock" and generates entry scan data. This process indicates that mail has entered the mailstream.

Also, please refer to the same page where it states:

A stop-the-clock scan occurs for a mailpiece when it goes through any one of the sort operations that predict same-day delivery. The criteria for a stop-the-clock scan is that if the mailpiece passes through one of these sort operations before 10:00 a.m., it is nearly certain that it will be delivered by the carrier that same day.

- a. Please confirm that the entry scan provides the “start the clock” date and time entry data for a Confirm mailpiece, the facility name of entry, facility ZIP Code, and Shipment ID. If you do not confirm, please explain.
- b. Please confirm that the “start the clock” entry data and the stop-the-clock scan data provide accurate, reliable and consistent measurement of 1) in-transit time within the Postal Service, and 2) delivery service performance as a basis for determining achievement of delivery service standards for First-Class Mail and Standard Mail. If you do not confirm, please explain.
- c. Please identify and describe any and all problems that prevent the “start the clock” entry scan data and the stop-the-clock scan data from providing accurate, reliable and consistent measurement of 1) in-transit time within the Postal Service, and 2) delivery service performance as a basis for determining achievement of delivery service standards for First-Class Mail and Standard Mail.
- d. For each problem identified in subpart c. above, please rank order each problem from most important to least important, provide any data or analysis as to the extent of the problem, describe the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.

OCA/USPS-T40-24. This interrogatory seeks information on the shipments and mailpiece volume of Confirm.

- a. For Destination and Origin services separately, please provide the number of Confirm shipments provided by First-Class and Standard mailers, respectively, in the base year.
- b. For Destination and Origin services separately, please provide the total volume of Confirm mailpieces provided by First-Class and Standard mailers, respectively, in the base year.
- c. For Destination and Origin services, and First-Class and Standard mailpieces, separately, please provide the average number and the standard deviation of scans for each Confirm mailpiece.

OCA/USPS-T40-25. This interrogatory seeks information on the accuracy of mailpiece records for Confirm. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 46, where it states “the Postal Service cannot guarantee that every Confirm mailpiece with a PLANET Code will receive a scan.” Please provide the percentage of Confirm mailpieces with PLANET Codes that do not receive a scan. Please describe and discuss the source of the problem, the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.

OCA/USPS-T40-26. This interrogatory seeks information on the accuracy of mailpiece records for Confirm. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 46, where it states “the Postal Service cannot guarantee that every Confirm mailpiece with a PLANET Code will receive a scan.”

- a. Please confirm that a mailpiece scan record provides the facility ZIP Code, mail sortation operation code, date and time a mailpiece was processed, the POSTNET code, and the PLANET code. If you do not confirm, please explain.
- b. For each separately, please provide the percentage of mailpiece scan records that 1) lack a facility ZIP Code, or 2) have an inaccurate facility ZIP Code. If Postal Service-prepared percentages, or estimates thereof, are unavailable, have the requested percentages been estimated by any Confirm subscribers and provided to the Postal Service? Without identifying any Confirm subscriber(s), please provide the requested percentages, as estimated by Confirm subscribers.
- c. For both data elements identified in subpart b. above, please describe and discuss the source of the problem, the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.
- d. 1) For each separately, please provide the percentage of mailpiece scan records that have i) dates that pre-date when a mailing was entered, or ii) dates for scans that span more than three days. If Postal Service-prepared percentages, or estimates thereof, are unavailable, have the requested percentages been estimated by any Confirm subscribers and provided to the Postal Service? Without identifying any Confirm subscriber(s), please provide the requested percentages, as estimated by Confirm subscribers. 2) Is the Postal Service aware of mailpiece scan records that have dates for scans that

- are “future dates;” for example, the entry scan for a Confirm shipment occurs on June 6<sup>th</sup>, but the mailpiece scan record shows processing scans on June 9<sup>th</sup> or beyond? Please explain.
- e. For both data elements identified in subpart d.1), above, please describe and discuss the source of the problem, the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.
  - f. For each separately, please provide the percentage of mailpiece scan records that have 1) no operation codes, or 2) inaccurate operations codes. If Postal Service-prepared percentages, or estimates thereof, are unavailable, have the requested percentages been estimated by any Confirm subscribers and provided to the Postal Service? Without identifying any Confirm subscriber(s), please provide the requested percentages, as estimated by Confirm subscribers.
  - g. For both data elements identified in subpart f. above, please describe and discuss the source of the problem, the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.
  - h. For each separately, please provide the percentage of mailpiece scan records that have missing 1) POSTNET barcodes, or 2) PLANET codes. If Postal Service-prepared percentages, or estimates thereof, are unavailable, have the requested percentages been estimated by any Confirm subscribers and provided to the Postal Service? Without identifying any Confirm

subscriber(s), please provide the requested percentages, as estimated by Confirm subscribers.

- i. For both data elements identified in subpart h. above, please describe and discuss the source of the problem, the actions taken (if any) to correct the problem, and discuss the results achieved (if any). If no actions have been taken, please discuss the reasons.

OCA/USPS-T40-27. This interrogatory seeks information on the accuracy of mailpiece records for Confirm. Please refer to Postal Service Publication 197, the Confirm User Guide, at page 46, where it states “the Postal Service cannot guarantee that every Confirm mailpiece with a PLANET Code will receive a scan.”

- a. Please explain how the Postal Service compensates Confirm subscribers for mailpieces with a PLANET Code that 1) do not generate a mailpiece scan, or 2) have missing or inaccurate data in the mailpiece scan record.
- b. If the Postal Service does not compensate Confirm subscribers for mailpieces that 1) do not generate a mailpiece scan, or 2) have missing or inaccurate data in the mailpiece scan record, please describe and discuss the Postal Service’s plans to do so.

OCA/USPS-T40-28. This interrogatory seeks information on the value of Confirm service for single-piece First-Class Mail.

- a. In what ways (if any) has single-piece First-Class Mail benefited from Confirm service? Please explain.
- b. In what ways (if any) would single-piece First-Class Mail benefit from a more extensive subscription base for Confirm service? Please explain.

- c. In what ways (if any) could Confirm service be modified to provide accurate, reliable and consistent measurement of delivery service performance as a basis for determining achievement of delivery service standards for single-piece First-Class Mail? Please explain.
- d. Please describe and provide any reports, studies, analysis or other documents involving subpart c., above.