

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
(OCA/USPS -2-7)
(June 22, 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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OCA/USPS-2. This interrogatory seeks information on the service standards and achieved service performance for Express Mail. Please refer to the Postal Service's Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any "performance goals" (herein "service standards") and "achieved levels of service" (herein "achieved service performance") for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) Express Mail as a whole; 2) the following Express Mail services (herein "services"): Custom Designed (Rate Schedule (herein "RS") 122), Next Day and 2d Day-PO to PO (RS 123), and, Next Day and 2d Day-PO to Addressee (RS 123); and, 3) any rate category, or any subset of mail or type of mail service of any of the services. Where applicable, please define any subset of mail or type of mail service of any of the services.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable, please indicate "Not Measured" if achieved service performance data is not measured for Express Mail as a whole, any of the services, or any rate category, or any subset of mail or type of Express Mail service.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.

- c. Please provide a citation to the Domestic Mail Manual (herein “DMM”) for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.). Where applicable, for Express Mail as a whole, any of the services, or any rate category, or any subset of mail or type of Express Mail service, if there is no achieved service performance data provided in response to subpart a., above, and if there is no applicable service standard, please indicate “No Service Standard.”
- d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

- e. For Express Mail as a whole, or any of the services listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).

OCA/USPS-3. This interrogatory seeks information on the service standards and achieved service performance for First-Class Mail. Please refer to the Postal Service’s Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any “performance goals” (herein “service standards”) and “achieved levels of service” (herein “achieved service performance”) for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) for First-Class Mail as a whole; 2) the following First-Class Mail subclasses (herein “subclasses”): Letters and Sealed Parcels (Rate Schedule (herein “RS”) 221), Cards (RS 222), and Priority Mail (RS 223); and , 3) any rate category, or a subset of mail or type of mail service of any of the subclasses. Where applicable, please define any subset of mail or type of mail service of any of the subclasses.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable,

- please indicate “Not Measured” if achieved service performance data is not measured for First-Class Mail as a whole, any of the subclasses, or any rate category, or any subset of mail or type of First-Class Mail service.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.
 - c. Please provide a citation to the Domestic Mail Manual (herein “DMM”) for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.). Where applicable, for First-Class Mail as a whole, any of the subclasses, or any rate category, or any subset of mail or type of First-Class Mail service, if there is no achieved service performance data provided in response to subpart a., above, and if there is no applicable service standard, please indicate “No Service Standard.”
 - d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2)

describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

- e. For First-Class Mail as a whole, or any of the subclasses listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).

OCA/USPS-4. This interrogatory seeks information on the service standards and achieved service performance for Standard Mail. Please refer to the Postal Service’s Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any “performance goals” (herein “service standards”) and “achieved levels of service” (herein “achieved service performance”) for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) Standard Mail; 2) the following Standard Mail subclasses (herein “subclasses”): Regular (Rate Schedule (herein “RS”) 321), Enhanced Carrier Route (RS 322), Nonprofit (RS 323), and Nonprofit-Enhanced Carrier Route (RS 324) ; and, 3) any rate category, or any subset of mail or type of mail

service of any of the subclasses. Where applicable, please define any subset of mail or type of mail service of any of the subclasses.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable, please indicate "Not Measured" if achieved service performance data is not measured for Standard Mail as a whole, any of the subclasses, or any rate category, or any subset of mail or type of Standard Mail service.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.
- c. Please provide a citation to the Domestic Mail Manual (herein "DMM") for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.). Where applicable, for Standard Mail as a whole, any of the subclasses, or any rate category, or any subset of mail or type of Standard Mail service, if there is no achieved service performance data provided in response to subpart a., above, and if there is no applicable service standard, please indicate "No Service Standard."

- d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.
- e. For Standard Mail as a whole, or any of the subclasses listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).

OCA/USPS-5. This interrogatory seeks information on the service standards and achieved service performance for Periodicals. Please refer to the Postal Service’s Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any “performance goals” (herein “service standards”) and “achieved

levels of service” (herein “achieved service performance”) for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) Periodicals as a whole; 2) the following Periodicals subclasses (herein “subclasses”): Outside County (Rate Schedule (herein “RS”) 421), and Within County (RS 423) ; and, 3) any rate category, or any subset of mail or type of mail service of any of the subclasses. Where applicable, please define any subset of mail or type of mail service of any of the subclasses.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable, please indicate “Not Measured” if achieved service performance data is not measured for Periodicals as a whole, any of the subclasses, or any rate category, or any subset of mail or type of Periodicals service.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.
- c. Please provide a citation to the Domestic Mail Manual (herein “DMM”) for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release,

- executive letter directive, etc.). Where applicable, for Periodicals as a whole, any of the subclasses, or any rate category, or any subset of mail or type of Periodicals service, if there is no achieved service performance data provided in response to subpart a., above, and if there is no applicable service standard, please indicate “No Service Standard.”
- d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.
- e. For Periodicals as a whole, or any of the subclasses listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).

OCA/USPS-6. This interrogatory seeks information on the service standards and achieved service performance for Package Services. Please refer to the Postal Service's Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any "performance goals" (herein "service standards") and "achieved levels of service" (herein "achieved service performance") for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) Package Services as a whole; 2) the following Package Services subclasses (herein "subclasses"): Parcel Post (Rate Schedule (herein "RS") 521), Bound Printed Matter (RS 522), Media Mail (RS 523), and Library Mail (RS 524) ; and, 3) any rate category, or any subset of mail or type of mail service of any of the subclasses. Where applicable, please define any subset of mail or type of mail service of any of the subclasses.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable, please indicate "Not Measured" if achieved service performance data is not measured for Package Services as a whole, any of the subclasses, or any rate category, or any subset of Package Services mail or type of service.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.

- c. Please provide a citation to the Domestic Mail Manual (herein “DMM”) for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.). Where applicable, for Package Services as a whole, any of the subclasses, or any rate category, or any subset of Package Services mail or type of service, if there is no achieved service performance data provided in response to subpart a., above, and if there is no applicable service standard, please indicate “No Service Standard.”
- d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

- e. For Package Services as a whole, or any of the subclasses listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).

OCA/USPS-7. This interrogatory seeks information on the service standards and achieved service performance for Special Services. Please refer to the Postal Service’s Request, Attachment G, page 37, quoting Commission rule 54(n), which requires identification of any “performance goals” (herein “service standards”) and “achieved levels of service” (herein “achieved service performance”) for the classes and subclasses of mail.

Please answer subparts a.–d., below, for 1) Special Services as a whole; 2) the following Special Services: Address Corrections (Rate Schedule (herein “RS”) 911), Mailing Lists (RS 912), Post Office Box and Caller Service (RS 921), Business Reply Mail (RS 931), Merchandise Return Service (RS 932), On-Site Meter Service (RS 933), Bulk Parcel Return Service (RS 935), Shipper Paid Forwarding (RS 936), Certified Mail (RS 941), Registered mail (RS 942), Insurance (RS 943), COD (RS 944), Return Receipts (RS 945), Restricted Delivery (RS 946), Certificated of Mailing (RS 947), Delivery Confirmation (RS 948), Signature Confirmation (RS 949), Parcel Air Lift (RS 951), Special Handling (RS 952), Stamped Envelopes (RS 961), Stamped Cards (RS 962), Money Orders (RS 971), and Confirm (RS 991); and, 3) any rate category, or any

subset of mail or type of mail service of any of the Special Services. Where applicable, please define any subset of mail or type of mail service of any of the Special Services.

- a. For FY 2005 and FY 2006, by quarter, please provide data from all measuring systems showing the achieved service performance. If achieved service performance data is available from more than one information system, statistical report or other data source, please provide it. Where applicable, please indicate "Not Measured" if achieved service performance data is not measured for Special Services as a whole, any of the individual Special Services, or any rate category, or any subset of mail or type of mail service of any of the Special Services.
- b. Please identify the information system(s), statistical report(s), or other data source(s) from which the achieved service performance data provided in response to subpart a., above, is obtained.
- c. Please provide a citation to the Domestic Mail Manual (herein "DMM") for the service standard(s) applicable to the achieved service performance data provided in response subpart a., above. If no citation to the DMM is applicable, state the applicable service standard, provide a citation to the relevant source for the stated service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.). Where applicable, for Special Services as a whole, any of the individual Special Services, or any rate category, or any subset of mail or type of mail service of any of the Special Services, if there is no achieved service performance data provided in response to subpart a.,

above, and if there is no applicable service standard, please indicate “No Service Standard.”

- d. Please explain how the achieved service performance data provided in response to subpart a., above, is statistically representative for each of the service standards being measured, as cited in subpart c., above. If the achieved service performance data provided in response to subpart a., above, is not statistically representative, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.
- e. For Special Services as a whole, or any of the individual Special Services or their subclasses listed above, where no achieved service performance data is provided in response to subpart a., above, please describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3, or 5 years, to provide achieved service performance data responsive to Commission rule 54(n). Please indicate “No Plans” if there are no existing plans to provide achieved service performance data responsive to Commission rule 54(n).