

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
KIRK KANEER TO INTERROGATORY OF DAVID POPKIN,  
REDIRECTED FROM THE POSTAL SERVICE  
DBP/USPS-379

The United States Postal Service hereby provides the response of witness Kirk Kaneer to the following interrogatory of David Popkin: DBP/USPS-379, filed on July 27, 2006, and redirected from the Postal Service.

The interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Kenneth N. Hollies  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084  
[khollies@usps.gov](mailto:khollies@usps.gov)  
August 7, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER  
TO INTERROGATORY OF DAVID POPKIN,  
REDIRECTED FROM THE POSTAL SERVICE

**DBP/USPS-379.** Please refer to your response to Interrogatory DBP/USPS-156. Your reference to the response to Interrogatory DFC/USPS-T41-8 does not appear to match my Interrogatory which relates to the comparison of post office box service vs. city delivery service at the same facility.

- [a] Please respond to the original Interrogatory.
- [b] Please explain how having public access to a box section can reduce the level of security to mail contained in individual locked boxes in the facility.
- [c] Please confirm, or explain if you are unable to confirm, that even if a boxholder normally picks up mail on Monday through Friday, that there may be an instance where a Saturday pick-up is desired.

**RESPONSE:**

- [a] The response to DFC/USPS-T41-8 discusses 5-day and 6-day delivery; it can be applied to a comparison of delivery to Post Office boxes, carrier delivery, or a mix of the two. However, because of the widely recognized distinctions between Post Office box delivery and carrier delivery, most customers likely would not find this last comparison to be helpful. Moreover, the quotation given in response to DBP/USPS-22 describes several post office box service attributes that support the assertion that post office box service is “a premium” form of delivery, as also noted in Domestic Mail Manual Section 508.4.2.1. See also my testimony, USPS-T-41 at 31-32.
- [b] A closed lobby area represents an additional layer of security beyond the post office box’s lock.
- [c] Confirmed.