

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-289)  
(August 8, 2006)

The United States Postal Service hereby provides its institutional response to interrogatory DBP/USPS-289, which was filed by Mr. Popkin on July 14, 2006, and due on July 28, 2006. A motion for late acceptance is being filed this day.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, Fax -5402  
Brian.M.Reimer@usps.gov

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**DBP/USPS-289** This refers to your response to Interrogatory OCA/USPS-1 in particular the attached letter as it refers to the measurements of performance for retail Priority Mail.

[a] Please confirm, or explain if you are unable to confirm, that if a Priority Mail article was not collected or picked-up as scheduled it would not be reflected in the results.

[b] Please confirm, or explain if you are unable to confirm, that Priority Mail is delivered overnight.

[c] Please confirm, or explain if you are unable to confirm, that mailers who send Priority Mail to an area in the overnight delivery area will expect their mail to be delivered overnight.

[d] Please advise why Priority Mail is considered to be a two-/three-day product.

[e] Please confirm, or explain if you are unable to confirm, that by not indicating that some Priority Mail will be delivered overnight may cause some mailers to utilize Express Mail unnecessarily.

[f] Please advise what types of scans of the Delivery Confirmation program will indicate the delivery of a mailpiece in the determination of performance statistics.

[g] Please confirm, or explain if you are unable to confirm, that Delivery Confirmation service may actually slow up the delivery of the mailpiece since it requires that the mailpiece be held out for scanning.

[h] Please describe the procedures that are utilized in scanning a Priority Mail article at the office of mailing, in transit through the various mail processing facilities, at the delivery office, and in actual delivery.

[i] Please advise why Delivery Confirmation service is believed to be a valid proxy for all Priority Mail service.

**RESPONSE:**

(a) Not confirmed. An article will be entered into PTS when it is scanned for the first time. Please see responses to OCA/USPS-69-71.

(b) Confirmed that some Priority Mail is delivered overnight.

(c) The Postal Service is not in a position to state the expectations of a particular individual mailer, but it is reasonable to assume that a mailer who

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knows that the service standard for delivering a Priority Mail piece to a certain destination is one day would assume that the mail will be delivered in one day.

(d) Most Priority Mail has a two day service standard, and some has a three day standard.

(e) Not confirmed. As one example, a mailer may choose Express Mail over Priority Mail because of the Express Mail guarantee.

(f) Please see response to OCA/USPS-69-71.

(g) Not confirmed. A mailpiece is not held out for scanning. The carrier provides a scan when the piece is delivered.

(h) Please see responses to OCA/USPS-69-71.

(i) Please see responses to OCA/USPS-69-71.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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