

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
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-97-99) (August 25, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatories of the Office of the Consumer Advocate, which were filed on August 3, 2006, and due on August 17, 2006:

OCA/USPS-97-99

Each interrogatory is stated verbatim and is followed by the response. A motion for late acceptance has been filed this day.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-97. This interrogatory seeks information on the service standards and achieved service performance for Express Mail. Please refer to your response to OCA/USPS-62.

a. Refer to your response to part a. Please confirm that the Postal Service collects Product Tracking System (herein "PTS") data on achieved service performance separately for Custom Designed (Rate Schedule (herein "RS") 122) Express Mail service. If you do not confirm, please explain.

b. Refer to your response to part a. In what ways (if any) does the Postal Service measure achieved service performance for Custom Designed (RS 122) Express Mail service. Please explain, and provide any achieved service performance data for Custom Designed (RS 122) Express Mail service.

c. Refer to your response to part d., which includes the phrase "NPA time measurement period." Please define and explain.

RESPONSE:

a. Not confirmed. The Postal Service does not collect PTS data on achieved service performance separately for Custom Designed (Rate Schedule 122) Express Mail service, or use it as one of the bases for the Express Mail service performance measurement.

b. The Postal Service does not measure achieved service performance separately for Custom Designed (Rate Schedule 122) Express Mail service.

c. The NPA time measurement period does not include certain dates around the Holiday period in December (although service performance is still measured during that time period). The Postal Service was stating its view that PTS is a statistically representative measure of the service standards for Express Mail that it measures for the NPA time-measurement period.

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OCA/USPS-98. This interrogatory seeks information on the service standards and achieved service performance for First-Class Mail. Please refer to your response to OCA/USPS-63.

a. Refer to your response to part a., which asked the Postal Service to “confirm that the External First-Class (herein “EXFC”) system does not provide achieved service performance data for First-Class Mail as a whole, or the following First-Class Mail subclasses, as a whole: Letters and Sealed Parcels (Rate Schedule (herein “RS”) 221), or Cards (RS 222).” Does the response, “Not Confirmed,” mean that the EXFC system provides achieved service performance data for First-Class Mail as a whole, and the specified subclasses? Please explain the basis for the response “Not confirmed.”

b. Refer to your response to parts b. and c., which asked the Postal Service to confirm that it measures achieved service performance using measuring systems other than the EXFC system for First-Class Mail as a whole, the First-Class Mail subclasses Letters and Sealed Parcels (RS 221), and Cards (RS 222), and one or more rate categories, or one or more subsets of mail.

i) Please explain why the Postal Service did not confirm part b. inasmuch as the response also states that the Postal Service “does not measure achieved service performance using measuring systems other than the EXFC system for First-Class Mail” and the stated subclasses.

ii) Does the Postal Service use ODIS data in measuring achieved service performance for First-Class Mail as a whole, the specified subclasses, one or more rate categories, or one or more subsets of mail? Please explain.

c. Refer to your response to part d., which asked the Postal Service to “confirm that the EXFC system measures achieved service performance for a subset of mail or type of First-Class Mail service, namely, seeded letter-shaped mailpieces entered at collection boxes as single-piece First-Class Mail in the Letters and Sealed Parcels subclass.” Please explain the “Not confirmed” response inasmuch as the response appears to confirm the interrogatory. Does the response, “Not Confirmed,” mean that the EXFC system provides achieved service performance data for mailpieces other than letter-shaped mailpieces entered at collection boxes as single-piece First-Class Mail in the specified subclasses?

d. Refer to your response to part f. Please provide any documentation or analysis to support the basis for the claim that the “Postal Service *believes* that EXFC is statistically representative for what it measures” (Emphasis added)

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RESPONSE TO OCA/USPS-98 (continued)

e. Refer to your response to part f. Please confirm that the 463 ZIP Code areas selected on the basis of geographic and volume density constitutes the “sample frame.” If not, please confirm and provide the sample frame for the EXFC system.

f. Refer to your response to part f. Please provide the “sample selection” rules for the 463 ZIP Code areas selected on the basis of geographic and volume density.

g. Refer to your response to part g. Please provide any documentation or analysis to support the basis for the claim that the “Postal Service *believes* that PTS is statistically representative for what it measures” (Emphasis added)

h. Refer to your response to part g. Please provide the “sample frame” for PTS with respect to Priority Mail.

i. Refer to your response to part g. Please provide the “sample selection” rules for PTS with respect to Priority Mail.

RESPONSE:

a. The Postal Service was concerned that the wording of OCA/USPS-63 (a) could be interpreted differently by different people, and determined that the best approach to answering this subpart was to say "Not confirmed," followed by the Postal Service's position on what EXFC measures.

b. i. The Postal Service was concerned that the wording of OCA/USPS-63 (b) could be interpreted differently by different people, and determined that the best approach to answering this subpart was to say "Not confirmed," followed by a statement of what the Postal Service uses for performance measurement of First-Class Mail.

ii. No. ODIS/RPW data are not utilized in measuring achieved service performance.

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RESPONSE TO OCA/USPS-98 (continued)

c. The Postal Service could not confirm this subpart as written, and determined that the best approach to providing an answer was to state "Not confirmed," followed by a statement of how EXFC operates.

d. In answering this interrogatory, the Postal Service did not consult any specific documentation or analysis. It presented the positions of those individuals who are responsible for the EXFC system.

e. Confirmed that the EXFC system is an external measurement system of collection box to mailbox delivery performance that continuously tests a panel of 463 ZIP Code areas selected on the basis of geographic and volume density from which 90 percent of First-Class volume originates and 80 percent destinate.

f. The phrase "sample selection rules" is ambiguous. The panel of 463 ZIP Code areas is selected on the basis of geographic and volume density from which 90 percent of First-Class volume originates and 80 percent destinate.

g. In answering this interrogatory, the Postal Service did not consult any specific documentation or analysis. It presented the positions of those individuals who are responsible for the PTS system.

h. The use of the phrase "sample frame" is ambiguous. PTS is a virtual census of all Priority Mail pieces that are scanned.

i. The use of the phrase "sample selection rules" is ambiguous. PTS is a virtual census of all Priority Mail pieces that are scanned.

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OCA/USPS-99. This interrogatory seeks information on the service standards and achieved service performance for Package Services. Please refer to your response to OCA/USPS-6. Refer to your response to part f. Please explain why the Postal Service does not use PTS data as a measurement of compliance with the service standards cited in Attachment G of the Request, Compliance Statement, response to Rule 54(n) for Parcel Post, Bound Printed Matter, Media Mail and Library Mail sold at retail with Delivery Confirmation.

RESPONSE:

At the current time, the Postal Service, with the resources available to it, has not decided to dedicate those resources to measuring achieved service performance for Parcel Post, Bound Printed Matter, Media Mail and Library Mail sold at retail with Delivery Confirmation.

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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