

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

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-9-19)
(May 6, 2005)

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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-9. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n), which states, in part, “This rule required identification of any performance goals which have been established for the classes and subclasses of mail,” and the chart entitled “United States Postal Service Service Standards.” Please explain how the Service Standards chart represents the “performance goals” required to be identified by Rule: 54(n) for the classes of mail listed.

OCA/USPS-10. Please refer to Attachment F to the Request, page 35, and the chart entitled “United States Postal Service Service Standards.”

- a. Please define the terms “Overnight” and “2nd Day” as used in the chart.
- b. Please confirm that the “Service Standards” in the chart for Express Mail “Overnight” service is found at DMM §113.4.2, January 6, 2005. If you do not confirm, please explain.
- c. Please confirm that the “Service Standards” in the chart for Express Mail “2nd Day” service is found at DMM §113.4.3, January 6, 2005. If you do not confirm, please explain.

OCA/USPS-11. Please refer to Attachment F to the Request, page 35, and the text of Rule 54: (n), which states, in part, “The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set.” Also please refer to the paragraph at the bottom of page 35, where it refers to “[a]chieved levels of performance.”

- a. Please confirm that the Origin-Destination Information System (ODIS) Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to

- the Overnight and 2nd Day service standards for Express Mail. If you do not confirm, please explain.
- b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail. If you do not confirm, please explain. If you do confirm, please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail.
- c. If data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail is not included in the Request, please provide the requested data.

OCA/USPS-12. Please refer to Attachment F to the Request, page 35, the “Notes” column for Express Mail in the chart entitled “United States Postal Service Service Standards,” and the Domestic Mail Manual (DMM) §113.4.2.2, January 6, 2005, which refers to an “Express Mail Next Day Service directory” as being available at local post offices.

- a. Please confirm that the directories contain ZIP Codes for which Next Day service is provided from the ZIP Code of the local post offices in which the directories are available. If you do not confirm, please explain.
- b. Please confirm that all Next Day delivery ZIP Code pairs, i.e., ZIP Codes to which Next Day service is provided from the ZIP Codes of all local post offices (or other offices of entry), exist at the Postal Service as a data base. If

you do confirm, please describe the size and format of the data base. If you do not confirm, please explain.

- c. Please describe the decision-making process by which Express Mail Next Day delivery ZIP Code pairs are changed into Second Day Service, and vice versa. For changes from Express Mail Next Day to Second Day service, and vice versa, please explain how often such changes take place on an annual basis, and the number of ZIP Code pairs changed in the last three years.

OCA/USPS-13. Please refer to Docket No. C2005-1, Answer of United States Postal Service, filed May 5, 2005.

- a. Please confirm that the Postal Service delivers Express Mail on the "2nd Delivery Day." If you do not confirm, please explain.
- b. Please confirm that the "2nd Delivery Day" may be three or more calendar days after the date of entry of an Express Mail piece. If you do not confirm, please explain.
- c. What percent of Express Mail is delivered on the "2nd Delivery Day?"

OCA/USPS-14. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

- a. Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, and 3rd Day Priority Mail service.
- b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

OCA/USPS-15. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, “The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set.” Also please refer to the paragraph at the bottom of page 35, where it refers to “[a]chieved levels of performance.”

- a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the Overnight, 2nd Day, and 3rd Day service standards for Priority Mail. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Priority Mail, and to the Priority Mail service standards referred to in response to interrogatory OCA/USPS-13, above. If you do confirm, please provide data on the achieved levels of performance with respect to the Overnight, 2nd Day and 3rd Day service standards for Priority Mail.
- b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the Overnight, 2nd Day and 3rd Day service standards for Priority Mail. If you do not confirm, please explain.
- c. Please explain how the Postal Service uses ODIS data to improve Priority Mail so as to achieve the Priority Mail service standards.
- d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the

Overnight, 2nd Day and 3rd Day service standards for Priority Mail referred to in response to interrogatory OCA/USPS-13, above.

OCA/USPS-16. Please refer to USPS-LR-K-82. Refer to page 10 of the ODIS Quarterly Statistics Reports contained therein, and the line "All Priority." Please define the terms "Identified" and "Nonidentified" as they relate to Priority Mail.

OCA/USPS-17. Please refer to USPS-LR-K-82, the ODIS Quarterly Statistics Reports. Please explain how the ODIS data is used by the Postal Service to develop information on postal revenues, costs, and in postal operations.

OCA/USPS-18. Please refer to USPS-LR-K-82, the ODIS Quarterly Statistics Reports.

- a. Please confirm that ODIS is the only data or measurement system that provides the average number of days to delivery for the mail classes and groups listed. If you do not confirm, please explain.
- b. Please confirm that ODIS is the only data or measurement system that provides the percentage of mail delivered for Day 1 through Day 10 for the mail classes and groups listed. If you do not confirm, please explain.
- c. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10. If you do not confirm, please explain.
- d. Please confirm that ODIS is the only data or measurement system that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for the mail classes and groups listed. If you do not confirm, please explain.

- e. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and Inter-P&DC volume, and the average number of days to delivery for such volume. If you do not confirm, please explain.

OCA/USPS-19. Please describe and provide documentation for any and all methods by which the Postal Service

- a. monitors and verifies that delivery offices actually deliver all mail sent from plants or directly entered,
- b. records volumes sent from plants to delivery offices,
- c. records and verifies payment of postage for mail entered at delivery offices.