

ORIGINAL

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

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OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T7-14-16 AND 18-20)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T7-14-16, and 18-20, filed on July 16, 1996. Interrogatories OCA/USPS-T7-13 and 17 were redirected to witness Lion.


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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking


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July 30, 1996

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RESPONSE OF U.S. POSTAL SERVICE WITNESS NEEDHAM TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T7-14. Please refer to page 25, lines 3-5 of your testimony. This testimony implies that waiting lists are caused by non-resident boxholders.

- a) Please confirm that you cannot demonstrate any correlation between the number of non-resident box holders and the number of applicants on waiting lists for post office boxes at facilities. If you do not confirm, please provide whatever data are available that demonstrate a relationship between non-resident boxholders and waiting lists. If this data does exist, please specify whether the waiting lists contain non-resident applicants.
- b) Please confirm that you cannot demonstrate that waiting lists (that exclude non-resident applicants) are caused by non-resident box holders. If you do not confirm, please provide whatever data are available that demonstrate this causation.

RESPONSE:

- a) I can only confirm that it is impossible, with the information currently available, to demonstrate any correlation between the number of non-resident boxholders and the number of applicants on waiting lists for post office boxes at facilities for two main reasons. First, the Postal Service does not know the exact number of boxholders that would qualify under the proposal as non-residents. Second, the Postal Service does not know the full extent of those people waiting for box service because not all post offices with no available boxes maintain a waiting list. The decision whether or not to maintain a waiting list is made individually by each postmaster.

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- b) As I stated in my testimony on page 33, line 19-21, in some situations residents are unable to secure post office box service in their 5-digit ZIP Code delivery office due to a large influx of non-resident box customers. This is further supported by situations described in towns mentioned in my testimony on page 27-28. Therefore, I must emphasize that I have not implied in my testimony that waiting lists are solely caused by non-resident boxholders.

I cannot confirm that it could not be demonstrated that, in some situations, large proportions of non-resident boxholders would cause waiting lists for residents. Please refer to the specific descriptions of real situations as noted on pages 27-28 of my testimony.

OCA/USPS-T7-15. The purpose of this interrogatory is to identify all post offices where management at local facilities have formally complained about non-resident box holders to higher level functional units.

- a. Please provide all documents where management at local facilities have complained to higher level units, e.g. regional management, about non-resident box holders. If these documents are voluminous, you may satisfy this interrogatory by furnishing a list. The list should indicate the date of the document, the name of the local post office and to whom the document is addressed. To the extent feasible, please provide this information for the last two years.
- b. Please provide all documents received at headquarters from regional or lower-level functional units where the originator of the document identified and/or complained about problems caused by non-resident boxholders. If these documents are voluminous, at your option, you may satisfy this interrogatory by furnishing a list of the documents. The list should indicate the date of the document, the originator of the document, and a brief summary of its contents. To the extent feasible, please provide this information for the last two years.
- c. If the documents requested in parts "a" and "b" above do not account for all instances where management at local facilities have reported to higher level management problems with non-resident box holders, please describe all other instances. Please be as detailed as reasonably feasible.

RESPONSE:

The Postal Service is unable to identify all offices in which management has complained to supervisors regarding the problems caused by non-resident box holders.

- a-b. These subparts seem to expect that complaints regarding non-residents are reduced to writing and sent up the chain of command. Most operational problems are matters of discussion with an eye to resolving them rather than simple reports up the chain of command. While I have not located responsive documents, some inquiries are outstanding; should responsive non-privileged documents be located they will be provided.
- c. Problems with non-resident boxholders have been discussed informally at various postal meetings and postmaster conventions as well as up and down the chain of command. In the absence of quantified information regarding these problems, whether in the form of cost studies or compilations of written reports, the Postal Service chose to present this

information in what amounts to its native form: descriptions of operational difficulties from the postmaster level. Hence, Mr. Landwehr's testimony (USPS-T-3) includes qualitative descriptions of four offices which face varying degrees of the operational difficulties presented by non-resident boxholders that the non-resident fee is intended to address.

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OCA/USPS-T7-16. Refer to pages 2-6 of your testimony concerning the proposal for post office boxes. Assuming the proposal for post office boxes is recommended by the Commission, will the Postal Service implement service changes to enhance the quality of post office boxes for postal customers? Please describe any service changes to be implemented and provide documentary support.

RESPONSE:

The Postal Service is continually striving to implement service changes to enhance the quality of all of its products. With respect to box service, the Postal Service has been developing and performing limited testing of an electronic system which would allow boxholders to place a telephone call to check, via an automated line, whether or not there was mail in their box. Also, the Postal Service is currently in the planning stages of refining and redesigning the post office box service application form in an effort to make it more user-friendly. If the proposals in my testimony are recommended and accepted, the quality of box service would be enhanced by increasing the availability of boxes, especially for residents and when higher fees would justify box expansion.

RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM TO
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OCA/USPS-T7-18. Refer to pages 11-14 of your testimony concerning CMRAs.

- a) Please confirm that CMRAs take delivery of mail destined for CMRA boxes from postal carriers. If you do not confirm, please explain.
- b) To the extent CMRAs take delivery from postal carriers, please indicate the time of day CMRA would take delivery from postal carriers

RESPONSE:

- a) I can confirm that CMRAs take delivery from either letter carriers or, if the CMRA uses caller service or firm holdout, from other postal employees.
- b) CMRAs would take delivery from letter carriers during the planned course of the letter carriers' routes, unless special arrangements are made whereby the volume of mail to CMRA would make it more convenient for the letter carrier to drop off the mail for the CMRAs at the beginning of his/her route.

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OCA/USPS-T7-19. Refer to pages 11-14 of your testimony concerning CMRAs. To your knowledge, are CMRAs post office box or caller service customers of the Postal Service? Please explain your answer.

RESPONSE:

Although I personally am not aware of CMRAs using box or caller service, I would not be surprised if CMRAs use both box and caller service. I think CMRAs would benefit from taking advantage of the earlier delivery of box and caller service mail.

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OCA/USPS-T7-20. Refer to page 8, line 4-12, of your testimony.

- a) Please indicate the time of day and frequency mail destined for post office box customers is placed in the boxes.
- b) Please indicate the time of day and frequency mail is made available to caller service customers.

RESPONSE:

a and b) The responses to these interrogatories would vary from post office to post office.

DECLARATION

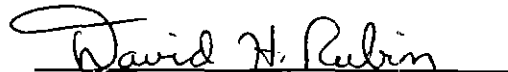
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: July 30, 1996

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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