

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LANDWEHR TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T3-7-9)

The United States Postal Service hereby provides responses of witness
Landwehr to the following interrogatories of the Office of the Consumer Advocate:
OCA/USPS-T3-7-9, filed on July 23, 1996.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 6, 1996

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Response of Witness Landwehr to OCA Interrogatories OCA/USPS-T3-7-9, MC96-3

OCA/USPS-T3-7. In your testimony at 4, you indicate that the non-resident customers in Middleburg, VA, tend to call for their mail at infrequent and irregular intervals.

- a. Of the non-resident post office box holders whose mail volume exceeds the box capacity, how frequently does the mail exceed the box capacity for 12 consecutive business days? Your response should include the percentage of non-resident post office box holders whose mail exceeds box capacity for 12 consecutive business days. Please provide the same percentage for resident post office box holders.
- b. For those non-resident customers who call for their mail at infrequent and irregular intervals, what is the average number of business days each month that post office box mail exceeds the box capacity? Please provide the same estimate for resident customers.
- c. Do any resident customers call for their mail at infrequent and irregular intervals? Please estimate the percentage of resident customers who call for their mail at infrequent and irregular intervals. Provide the same estimate for non-resident customers.
- d. For resident post office box holders, what is the average period of time between visits to retrieve their mail? Please provide the same estimate for non-resident customers.

RESPONSE:

- a-d. As explained in the Response to OCA/USPS-T3-1a, this information is not available.

Response of Witness Landwehr to OCA Interrogatories OCA/USPS-T3-7-9, MC96-3

OCA/USPS-T3-8 The following interrogatory refers to your testimony at 9.

In a recent case, one non-resident customer failed to pick up mail for over three weeks, and during that period, four containers of mail accumulated for the customer.

Did the Postal Service follow Domestic Mail Manual D920.1.7 and require the customer to use caller service? Please explain what action was taken. If no action was taken, explain why not.

RESPONSE:

See the Response to OCA/USPS-9.

The cited section of my testimony refers to the Blaine Post Office, which does not have any available post office boxes. Accordingly, that customer would continue to use the same box.

This interrogatory interprets DMM § D920.1.7 incorrectly since that regulation does not require any action by the postmaster. It states that the postmaster “can require,” which means the postmaster has discretion whether to take the prescribed measures. In addition, that regulation generally addresses daily mail overflow rather than mail accumulation, so it is not clear that it would be implicated by the facts described in my testimony even if larger boxes were available.

Requiring customers to move to a larger or more boxes, or to caller service, carries with it additional workload for the Postal Service and the customer since the customer’s address changes. Delivery delays inherent in forwarding mail and the need for the customer to notify correspondents tend to have a negative impact upon customer satisfaction. For these reasons, postmasters have an incentive to exercise the discretion inherent in 920.1.7 by managing the overflow problem rather than to force address changes upon customers.

Response of Witness Landwehr to OCA Interrogatories OCA/USPS-T3-7-9, MC96-3

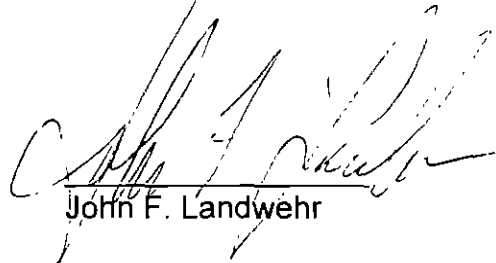
OCA/USPS-T3-9. Refer to page 3, lines 12-14, of your testimony concerning your familiarity with the operations in the Middleburg, VA; San Luis, AZ; and Blaine, WA post offices. Please confirm that the administrative burden associated with post office boxes rented by non-resident foreign nationals is greater than the administrative burden associated with non-resident US nationals. If you do not confirm, please explain.

RESPONSE:

Partially confirmed. The primary administrative burden caused by non-resident boxholders relates to the inability to locate and communicate with them, and this trait is shared by both foreign and domestic boxholders. It is my impression, however, that communicating internationally is generally more difficult than domestically. The Postal Service proposals in this case, however, pertain only to non-residents without distinguishing between foreign and domestic non-residents.

DECLARATION

I, John F. Landwehr, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.



John F. Landwehr

Dated: 8/6/96

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.



Kenneth N. Hollies

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