

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

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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
DAVID B. POPKIN
(DBP/USPS-T3-1-17)

The United States Postal Service hereby provides responses of witness Landwehr to the following interrogatories of David B. Popkin: DBP/USPS-T3-1-17, filed on August 9, 1996.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

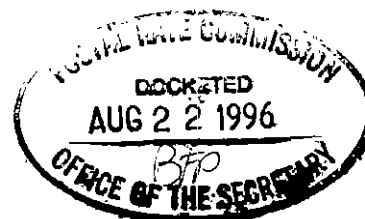
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August 22, 1996



DBP/USPS-T3-1. On page 3 of your testimony you indicate that the post office box service in the Villa Rica Post Office is fairly typical. How many other offices have you evaluated the box service for? Please provide a listing of these offices and the similarities and differences between them and Villa Rica. Provide details on how you became familiar with the operations in Middleburg VA, San Luis AZ, and Blaine WA. Have you ever visited these offices? If so, when did you visit, what was the purpose of the visit, and what did you discuss or learn during the visit? Prior to this rate case, have you ever communicated with the Postmaster in these three offices? Why were these offices chosen as being atypical offices? How many typical offices are there in the United States and how many atypical offices are there? What are the criteria that make an office typical? What are the criteria that make an office atypical?

RESPONSE:

In my testimony I contrast box operations in the Villa Rica Post Office with those in three other post offices that I learned about by discussing operations with their postmasters prior to the filing of this case, and later through visits. I initially learned about the San Luis, Middleburg and Blaine Post Offices from discussion of their mention during senior postal management and national postmaster meetings. I describe these offices in my testimony, but I have no specific definition of atypical or typical offices that would permit extrapolation to their respective counts nationwide.

DBP/USPS-T3-2. You indicate that the existence of Fairfield Plantation, a resort community, increases the number of hold mail orders and temporary forwarding requests. What studies have you done to indicate that the number of orders and requests is an increased amount? What are you comparing it to? Why did you choose that to compare it to? Provide details of any studies.

RESPONSE:

I have conducted no quantified studies. The statement in my testimony is based on knowledge of my office and how delivery to Fairfield Plantation compares to the other delivery points we serve.

DBP/USPS-T3-3. On page 2 of your testimony you indicate that your box section is open 24 hours daily for mail pick-up. Is this typical of offices throughout the country? Is there an employee on duty all 168 hours in the week? If not, how do you provide security during the hours that there is no employee on duty in the building? Provide copies of any directives, regulations, and guidelines [issued by headquarters, area, or district] that exist with respect to the hours that the box section in a post office should be open for the pick-up of mail. As a minimum, should the box section be open whenever an employee is on duty in the building? Under what conditions may or should the box section be open when there is no employee on duty? In those offices which are not open 24 hours a day, has any consideration been given to providing box holders with a "key" access to the building such as it done in many CMRA? If not, why not? Have any other items been considered to allow for greater access to the box section by box holders? If so, provide details.

RESPONSE:

Twenty four hour box sections are described in USPS-T-4. *See also*, witness Lion's response to NAPUS/USPS-T2-3. Management determines the number of hours an employee is on duty and, with the assistance with the Postal Inspection Service, the necessary security requirements. These are usually site specific and can vary depending upon the local situation and customer needs. I am not aware of any consideration being given to providing boxholders with key access.

DBP/USPS-T3-4. You indicate that a large number of the box holders are individuals who own property in the Blaine area. Are these individuals entitled to receive mail delivery while they are in the Blaine area? If not, why not? Are they eligible to receive mail either through General Delivery or via one of the seven rural routes [assuming they were on the route]? If not, why not? Are there any other means to provide the delivery service? If so, specify. Would each of these methods result in a greater cost to provide the delivery [compared to the post office box delivery] as well as reduce the income from the box rent? If not, why not?

RESPONSE:

If these individuals live in the Blaine area where street delivery is provided, then they would be entitled to general delivery or street delivery. Post office box service is the other delivery option available to these customers. Carrier delivery may or may not be more costly than box delivery, but I am not sufficiently conversant with the Postal Service costing methods to compare them. However, please see USPS-T-5, Appendix B, which addresses post office box and carrier delivery costs.

DBP/USPS-T3-5. You indicate that a recent case in Blaine resulted in a non-resident customer failing to pick up mail for over three weeks and four containers were accumulated in that period. Is this an isolated case or were there other cases? If so, provide details. Why is this unique to a non-resident? Is it possible for a resident to take a three week vacation and not pick up the mail while they were away? Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data on the frequency which is utilized by residents to pick up their mail vs. the frequency which is utilized by non-residents to pick up their mail? Has a similar study been conducted with respect to the number of times that the mail volume exceeds the volume of the box due to the failure to pick up the mail on a daily basis? If not, why not; if so, provide copies and details of the study.

RESPONSE:

The example of mail accumulation is an anecdotal illustration of general operational issues in the box sections of the offices I discuss in my testimony. While there are likely other examples, I have conducted no study to identify them.

DBP/USPS-T3-6. You indicate that when non-residents do pick up their mail, they often open it in the lobby and, after review, summarily discard envelopes and packaging materials resulting in lobby clutter and additional custodial requirements. Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data on the frequency and volume that residents vs. non-residents will open their mail in the lobby and, after review, summarily discard envelopes and packaging materials. If not, why not; if so, provide copies and details of the study.

RESPONSE:

See my responses to DBP/USPS-T3-1 and 5.

DBP/USPS-T3-7. You indicate that all communications with non-residents are, of necessity, by long distance. By long distance, do you mean that a telephone call to them would result in a long distance charge by the telephone company? If not, what do you mean? Are there instances where a telephone call to a resident could result in a long distance charge? Is it possible that there are many non-residents that would still be a local call due to an exchange area covering a number of ZIP Code areas or due to the availability of local calls to a number of other nearby exchange areas? Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data on the number of non-residents who have a long distance telephone number vs. a local telephone number and the times that were required to telephone each of the categories? If not, why not; if so, provide copies and details of the study.

RESPONSE:

My reference to long distance communications was in the context of international telephone calls to Canadian box holders for which there is a long distance charge. See also my responses to DBP/USPS-T3-1 and 5.

DBP/USPS-T3-8. You indicate that written communications left in the box are ineffective due to the sporadic nature of mail pick-up. The question of resident vs. non-resident was covered in interrogatory DBP/USPS-T3-5 above. Is leaving written correspondence the only written way to correspond with the box holders? If not, how else can it be done? Can written correspondence be sent to the non-resident's non-residence address? If not, why not?

RESPONSE:

This section of my testimony refers to the Blaine Post Office. The Blaine postmaster informed me that his box holders receive rent due notices via post office boxes, which is the customary method. There is no reason to think that other attempts at written communication would be any more effective, and in any event, they would add cost in the form of postage or transportation.

DBP/USPS-T3-9. You indicate that the use of the box is difficult to control since many box holders routinely allow other parties to use their boxes for mail order purchases. Explain what you mean by this statement. Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

All individual(s) authorized on the PS Form 1093 to receive their mail at a box may do so. See also my responses to DBP/USPS-T3-1 and 5.

DBP/USPS-T3-10. You indicate that infrequent use of the box results in higher than normal incidence of lost or forgotten box keys. Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

See my responses to DBP/USPS-T3-1 and 5.

DBP/USPS-T3-11. You indicate that forwarding of mail when boxes are closed is frustrated by inadequate communication with box holders. List all of the conditions under which a box may be closed and the action to be taken by the post office with respect to the mail that is contained in the box at the time of closing as well as mail that arrives after the closing. For each of these conditions, advise how inadequate communications increased the problem. Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

Please see *DMM* § 910.7.2 and *39 CFR* § 958, and my responses to *DBP/USPS-T3-1* and

5. Inadequate communication can result in mail becoming undeliverable as addressed instead of being forwarded.

DBP/USPS-T3-12. You indicated that non-residents are often late in paying box fees. Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

See my responses to DBP/USPS-T3-1 and 5.

DBP/USPS-T3-13. Confirm that the Villa Rica post office has sufficient post office boxes at the present time to meet the needs of both the residents and non-residents who have requested this service. Confirm that by adding 226 new boxes by November that this need will still be met and will likely be met for even a greater time.

RESPONSE:

Confirmed.

DBP/USPS-T3-14. Confirm that all of the residents who reside within the Middleburg VA corporate limits have only the General Delivery or post office box service to obtain their mail. Confirm that residents living outside the corporate limits have the same methods for mail delivery as well as rural delivery if on one of the two routes. If not, advise other means that are available. Would each of these methods result in a greater cost to provide the delivery [compared to the post office box delivery] as well as reduce the income from the box rent? If not, why not? Confirm that non-residents have the same options for delivery. Would Middleburg have less box holders along with less than the 15 to 20 prospective box holders if it had city delivery? If not, why not?

RESPONSE:

Please see USPS-T-3. Residents and non-residents living outside the corporate limits may have access to rural delivery, while most also have access to general delivery. See also my responses to DBP/USPS-T-3-1, 4 and 5.

DBP/USPS-T3-15. You indicate that the San Luis post office receives many Freedom of Information Act requests. What proportion of these requests would be from box holders who would be eligible for resident box fees vs. non-resident box fees? Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

I have conducted no study nor do I have any other basis for answering this question.

DBP/USPS-T3-16. You indicate that the San Luis post office has many customers who are unable to fill out the necessary forms without assistance. What proportion of this assistance is provided to box holders who would be eligible for resident box fees vs. non-resident box fees? Have you done a study [or is your testimony strictly anecdotal] which indicates that for all of the offices in the country, or even for any specific office or offices, which provides data with respect to this claimed problem with respect to residents vs. non-residents? If not, why not; if so, provide copies and details of the study.

RESPONSE:

I have no information on which to base an answer to this interrogatory.


DBP/USPS-T3-17. With respect to any surveys referred to in the preceding interrogatories which you have made and which are not made for all offices in the country, explain why you feel the number of offices that you surveyed is representative of the entire country.

RESPONSE:

Not applicable.

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: _____

8/21/96

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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August 22, 1996