

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

NOTICE OF UNITED STATES POSTAL SERVICE OF FILING OF ERRATA TO  
OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DPB/USPS-19-23, 24(A-C, E), 25, 26(C-E), and 28-36) - ERRATA  
(March 21, 2000)

The Postal Service hereby provides notice that it is today filing errata to its Objection to Interrogatories of David B. Popkin [DPB/USPS-19-23, 24(a-c, e), 25, 26(c-e), and 28-36], filed on March 20, 2000. Page 4 of the original Objection mistakenly referenced interrogatory DFC/USPS-24. The correct interrogatory should be DPB/USPS-24. A corrected page 4 is attached.

A copy of the entire set of questions being objected to from David B. Popkin is also attached. The questions were not included with the original Objection due to an administrative oversight.

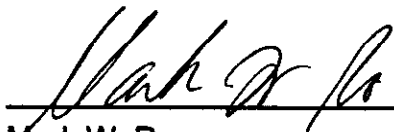
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Respectfully submitted,

UNITED STATES POSTAL SERVICE

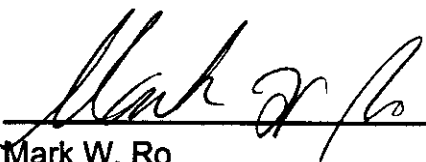
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Mark W. Ro

**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.

  
\_\_\_\_\_  
Mark W. Ro

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3231; Fax -5402  
March 21, 2000

Question 23 is similar to question 19, except that instead of focusing on operational collection practices, the topic is post office services on Saturday. Once again, the structure of the questions is to set forth statements of ideal operational practices, and to seek the Postal Service's confirmation. The stated purpose of these questions is to "evaluate the level of service that is being provided at post offices on Saturday, particularly those that do not have retail window service on that day." These questions are irrelevant, among other reasons, because the Commission does not recommend different rates depending on the day of the week that mail is entered. Likewise, the Commission does not recommend different rates depending on whether the originating facility has Saturday retail window service or not. Operational issues at this level of localized detail are simply not relevant to this proceeding.

Interrogatory DBP/USPS-24 begins with three parts (a-c) focused upon details of the customer interface with Shipping Online, a means by which customers access Postal Service information and services. As such, this interrogatory is perfectly in keeping with the irrelevance of most of this set of Popkin interrogatories by focusing on operational details that have no bearing on the issues in an omnibus rate case. The last part builds upon Mr. Popkin's apparent conclusion that Shipping Online offers the insurance from another provider, and asks a relevant question about how this insurance compares to Postal Service insurance. The Postal Service will thus respond to part (d).

Even within a particularly strong field of candidates, question 25 would appear to stand out as the most irrelevant question posed by Mr. Popkin in this set. On the subject of the recent Census Bureau mailings containing incorrect address information, this question contains 12 subparts seeking to elicit detailed operational information, such as the length of the barcodes on the mailpieces within those mailings, and whether the barcodes matched the correct address or the incorrect address. To state that a lack of nexus exists between these question and the issues which must be

BEFORE THE  
POSTAL RATE COMMISSION  
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Postal Rate and Fee Changes, 2000]

DOCKET NO. R2000-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The instructions contained in my Interrogatories dated February 29, 2000, are incorporated herein.

March 6, 2000

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-19 In order to determine the value to the customer for the ease and use of the collection system for First-Class Mail and other categories that may be mailed in collection boxes, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following as it applies to post offices that have city delivery service:

- a) Consistent with existing transportation, all collections should be made as late as possible.
- b) The specific requirements of the Postal Operations Manual must be complied with rather than a claim that collection times which do not meet these specific requirements are "consistent with the requirements of the local community" or reliance on another generalized claim.
- c) A collection box with a weekday 5 PM or later collection is required to be located at all post offices, branches, and stations.
- d) A collection box with a weekday 6:30 PM or later collection is required to be located all postal facilities that are in operation at that time.
- e) The Saturday collection is required at all 5 PM to 6:29 PM boxes at 1 PM or later and at all 6:30 PM or later boxes at 3 PM or later.
- f) All collections should be made as late as possible to meet the transportation. This applies to all collections on all days of the week. For example, if the transportation leaves

a post office at 6:15 PM, the last collection in front of the post office should not be 5 PM but should be made some 15 to 20 minutes before the departure. This contemplates that the office is staffed and would not apply where the mail was picked up by a contractor from an "empty" post office.

- g) Residential collection boxes should be collected as late in the day as possible. While dedicated collection runs may be utilized, to have a letter carrier pass the box at a later time than shown on the collection box and not make the collection is not appropriate.
- h) Letter carriers should collect the residential collection box at the time that they return to the delivery unit if they pass the box or readily could pass the box on their return to the office. Carriers may collect boxes that are not on their route, if appropriate.
- i) The collection times should be staggered on collection routes so that the collection time shown on the label will be the latest possible time consistent with not being collected early. Residential boxes should be collected no earlier than 20 minutes prior to the collection. Time decal boxes should be staggered perhaps in even 5 or 10 minute intervals, particularly on the final collection of the day. Having all of the 5 PM boxes marked at 5 PM [when the actual collection time might be as late as 6 PM] is inappropriate. Likewise, having all of the residential boxes marked at the time that the letter carrier leaves the office is also inappropriate.
- j) In addition to the boxes at post office facilities, all boxes which develop an average of 100 pieces on a weekday must be collected at 5 PM or later. The 100 piece average is the sum of all collections made on a given day at all collocated boxes. Having multiple boxes at the same location as well as having multiple collections prior to 5 PM is a reasonable likelihood that these boxes must be assumed to meet the 100 piece level.
- k) Within the city delivery area of a post office, a mailer should not have to travel more than one-half mile to a residential box and 2 miles to a time decal box.
- l) Saturday collections must be made from all collection boxes except those that may be in a locked building or facility and therefore not accessible by the collector. This includes boxes which are located in buildings that are accessible. The volume of mail developed on a Saturday does not eliminate the need for the collection.
- m) All collections which are shown on a collection box for a given day must result in the mail being dispatched on that day. This would mean that mail destined for the overnight area would be delivered on the following day, for the second day delivery area on the second day, etc.

- n) Collection boxes with Holiday collections should indicate what holidays it either applies to or does not apply to. This would not apply if collections are made on all holidays. Marking a box with a holiday collection time and then only collecting it on "minor" holidays is inappropriate.
- o) An accessible collection box must be located at all Processing and Distribution Centers that will be collected as late as possible. The earliest possible time would probably be just before the earliest possible time that the last mail arrives from the associated offices and completes the initial culling operation.
- p) All collocated boxes must be collected at all times that a collection is made from any of the boxes. If this would be service affecting, that should be noted on the collection label [for example, if the regular box was collected at 5 PM and 7 PM and the collocated Express Mail box was only collected at 5 PM because the 7 PM collection would not meet service standards, there should be a 7 PM collection made along with a remark that it may not meet service standards - otherwise a First-Class Mail letter mailed at 6 PM could be delivered prior to an Express Mail letter deposited at the same time]. An exemption to this might apply if an Express Mail box was being collected and transported directly to the Airport Mail Center without going through the P&DC.
- q) All mail which is collected by city delivery, rural, and HCR carriers must be dispatched to the P&DC on the day it was collected from the route and arrive at the P&DC to achieve the delivery standards related to the date the carrier collected the mail from the customer. This appears to be more of a problem on a Saturday. For example, if I were to give my letter carrier a letter on Saturday when he/she delivers mail to my house, that mail must be processed by the P&DC on Saturday for delivery on Monday or Tuesday. This would also mandate a later collection time on Saturday at the box located in front of the facility that the carriers operate out of since their mail is being dispatched anyway.
- r) Collection "box" labels or other appropriate signs should be posted on lobby drops inside of a postal facility.
- s) The collection times for the lobby drop located inside a postal facility and for the collection boxes located outside of the same facility should be the same times. This removes the confusion that would exist if they were different and it meets the requirement that both be as late as possible. The only exception would be that the lobby drop's last collection should be shown as the closing time of the lobby if that is earlier than the outside time.

- t) Very clear signs should be required in those instances where window service is provided after the collection time for the final dispatch of the day.
- u) Time decals are required to be affixed on all boxes which have a 5 PM or later collection on a weekday.
- v) There are no restrictions about placing collection boxes in transportation terminals.
- w) Collection times shown as 12 PM should be changed to show Noon since 12 PM is actually midnight.

DBP/USPS-20 [a] Provide copies of any Headquarters directives that have been furnished to the field with respect to collection requirements in the past three years. [b] Please provide copies of any Inspection Service or OIG audits on collection service that have been conducted in the past three years.

DBP/USPS-21 Provide copies of any guidance that has been provided to District Managers with respect to the applicability of the requirements for collection boxes at noncity delivery offices.

DBP/USPS-22 [a] Please explain why the regulations for having retail window service on Saturday at a post office [independent offices as opposed to a station or branch] require that the Postmaster demonstrate that there is a need for Saturday service rather than making a demonstration that it is not needed. [b] Provide copies of any Headquarters directives that have been furnished to the field with respect to whether or not Saturday window service should be provided.

DBP/USPS-23 To evaluate the level of service that is being provided at post offices on Saturday, particularly those which do not have retail window service that day, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following:

- a) If there are Post Office Boxes at the facility, the public must have access to them on a Saturday.
- b) This access must include the ability of picking up mail on Saturday which is not placed into the physical box, such as oversize or accountable mail and this is known on a formal basis to the public such as by the posting of a sign.

- c) If there is incoming mail to the facility on Saturday, this mail must be placed into the post office boxes on Saturday in a similar manner as it is on other days.
- d) Other delivery customers, such as city delivery, rural, HCR, and General Delivery customers, must have the ability to pick up mail on Saturday and the delivery notice, if any, must indicate this availability.
- e) A sign must be posted at the facility to indicate this availability to call for mail so that the customer will realize that while window service is not available, pick-up service is available on Saturday.
- f) All mail which is collected on Saturday by city delivery, rural, or HCR carriers from customers along their delivery routes will be dispatched to the P&DC for processing on Saturday?
- g) Customers who have a mail article weighing over one pound with the postage paid by means of postage stamps will have the ability to present the article at the Post Office for dispatch on a Saturday.
- h) Those facilities that do not have retail window service must post signs, visible from outside, advising customers where window service may be obtained?

DBP/USPS-24 With respect to Shipping on Line, [a] Please confirm that customers whose credit card is billed to a Post Office Box address may not utilize the service. Please explain the reason for this requirement. [b] Please confirm the following notice appears in the shipping process, "Note: Insurance is provided by a non-USPS carrier". [c] Please confirm that the name of the insurance carrier is U-Pic. [e] Explain and discuss any items that you are unable to confirm.

DBP/USPS-25 Regarding all of the recent publicity about the incorrect street number on Census Bureau mailings, [a] Advise the total additional cost, if any, to the Postal Service to process this mail. [b] Does the address on the mail contain a ZIP Code and if so, is it a 5-digit or 9-digit code? [c] Does the ZIP Code match the correct address or the address as printed on the mail [namely, with the extra digit in front of the true number]? [d] Is the mail barcoded? [e] If so, what is the length of the barcode? [f] Does the barcode match the correct address or the address as printed on the mail [namely, with the extra digit in front of the true number]? [g] If the letters are barcoded with the last two digits of the street number, does this create an erroneous barcode for single-digit street numbers? [h] With respect to



any mail that contains a correct barcode, will it be processed to the barcoded address regardless of the printed address appearing on the mail? [i] Explain the algorithms that are utilized when incorrect addresses are being analyzed on automated equipment to arrive at a correct barcode for the mail. For example, would a letter addressed to Englewood NY 07631 be sent to New Jersey since two out of the three parts of the address indicate that or would it also check to see that the street address was also a valid Englewood NJ address?

DBP/USPS-26 With respect to the rates that are being proposed for printed stamped envelopes, [c] What is the shipping charge for purchasing various quantities of printed stamped envelopes? [d] Confirm that a purchaser of printed stamped envelopes must pay for shipping and handling of the order and that the actual price paid for the envelopes is greater than that which has been proposed [by the amount of the shipping and handling charge]. [e] Why isn't the shipping and handling charge included in the price so that it will be an approved total price and will be known to the customer?

DBP/USPS-28 The reverse side of the Customer Copy of the Express Mail receipt Label 11-B provides the conditions for refunding the postage for those instances where overnight delivery is scheduled and is not accomplished. [a] Does this also apply to Second Day Express Mail where delivery is not accomplished by the second day after mailing? If so, why doesn't the receipt indicate so? [b] The back of the receipt indicates that refunds will not be made when detention was made for a law enforcement purpose. What types of activities would fit into that category? What section of the DMM authorizes that additional condition?

DBP/USPS-29 May Express Mail [Next Day and Second Day Service] be mailed at all postal facilities within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 1999 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military - main offices, stations, branches, rural carriers, and other points at which other classes of mail may be tendered - during their normal office hours? If not, provide any exceptions either by category or by specific office[s].

DBP/USPS-30 May Express Mail [Next Day and Second Day Service] be addressed to all valid addresses within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 1999 National Five-Digit ZIP Code and Post Office Directory, other than the three specific

ranges shown as military? If not, provide any exceptions either by category or by specific office[s].

**DBP/USPS-31** [a] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-29 have a listing of those 3-digit ZIP Code prefixes for which Next Day delivery will be achieved. [b] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-29 have a cutoff time, established by the Postmaster by which Express Mail must be presented to achieve Next Day delivery. [c] Must there be a reasonable minimum amount of time from the opening of the retail window service to the cutoff time to allow for mailers to deposit Express Mail on that day in order to achieve Next Day delivery? If not, why not? [d] If a facility has an cutoff time as noted in DMM E500.5.3 for Next Day service that is after 5 PM, must the time noted in DMM E500.6.2 for Second Day service be equal to or later, but not earlier than, the Next Day cutoff time? If not, why not? [e] Confirm, or discuss and explain if you are unable to do so, that an Express Mail article may be mailed at any facility noted in response to DBP/USPS-29 at any time that there are retail window service hours.

**DBP/USPS-32** [a] With respect to whether or not the Next Day Service will be achieved by 12 Noon or 3 PM, is this a function of the dispatching office, the delivery office, or both? [b] What criteria are utilized to make this determination? [c] Does it apply all days of the year? If not, what are the exceptions? [d] Does the same time of the day apply equally to Next Day and Second Day service? If not, please explain.

**DBP/USPS-33** For this interrogatory, the following assumptions apply:

1. The article will be deposited at a facility as noted in the response to DBP/USPS-29.
2. The article will be addressed to an address noted in the response to DBP/USPS-30.
3. The window hours for this post office are 8 AM to 6 PM.
4. The cutoff time for Express Mail Next Day Delivery service is 2 PM.
5. The list refers to those 3-digit ZIP Codes that are designated for overnight service.
6. The time of 10 AM was chosen to represent a time both before the 2 PM cutoff time and before 5 PM as noted in DMM Section E500.6.2 and can be as early as 12:01 AM; the time of 3 PM was chosen to be after the 2 PM cutoff time but before the 5 PM as noted in

DMM E500.6.2 and before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight; the time of 5:30 PM was chosen to be after the 5 PM as noted in DMM E500.6.2 and after the 2 PM cutoff time but before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight. [If the choice of time is significant, please explain in your response]

7. All articles are mailed on Day 0 which for convenience will be noted as Monday [if the choice of day is significant, please explain in your response] Please confirm, or explain and discuss if you are unable to confirm, that articles mailed as noted will receive a refund if they are not delivered by the time shown [other than for the exceptions shown in DMM E500.5.3 and 6.2]:

[a] Mailed Monday at 10 AM destined for an office on the list - will be delivered by 12 Noon or 3 PM Tuesday.

[b] Mailed Monday at 3 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[c] Mailed Monday at 5:30 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[d] Mailed Monday at 10 AM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[e] Mailed Monday at 3 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM. Wednesday.

[f] Mailed Monday at 5:30 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Thursday.

DBP/USPS-34 [a] Confirm, or explain if you are unable to do so, that Express Mail will be delivered all 365/6 days a year. [b] Confirm, or explain if you are unable to do so, that Express Mail may be addressed to any authorized type of address, including, but not limited to, city delivery street address, post office box, General Delivery, Rural Route / HCR Route in the RR 2 Box 123 format, and Rural Route / HCR Route in the city delivery type format [123 Main St].

DBP/USPS-35 [a] Confirm, or explain if you are unable to do so, that for Express Mail articles other than those addressed to a Post Office Box or General Delivery, an actual physical attempt at the addressee's location must be made prior to the guaranteed time or it

will be considered a failure [and thus a refund of postage may be obtained] unless it meets one of the two exemptions in DMM Section E500.5.3/6.2 a and b. [b] Confirm, or explain if you are unable to do so, that Express Mail which is addressed to a Post Office Box or General Delivery will constitute a failure if the addressee does not have access to the post office box and/or the ability to claim the article such as might occur if the box section was closed or the notice of arrival was placed in the box but it was not possible for the addressee to claim the mail. [c] Confirm, or explain if you are unable to do so, that contacting an addressee by telephone or by requiring an addressee to pick up their Express Mail at a facility would constitute a failure [other than PO to PO service]. [d] May Post Office to Post Office Service be sent to all post offices in the areas as noted in response to DBP/USPS-30? If not, provide a listing of all offices to which it may be sent. [e] Confirm, or explain if you are unable to do so, that the guaranteed delivery times for both PO to Addressee and PO to PO will be the same areas - both overnight and second day. [f] Clarify DMM Section E500.6.4 - if a PO-PO Express Mail article is sent to a second day area on a Saturday, will delivery be guaranteed on Monday or Tuesday [assume the delivery office is closed on Sunday and open the other six days of the week - is delivery made on the second business day after mailing - Tuesday in this case - or is it delivered on the first business day which is on or after the second day - Monday in this case]?

DBP/USPS-36 With respect to the delivery of Express Mail, do regulations or Headquarters directives mandate each of the following and/or discuss its applicability [please provide copies of the directives and/or citation of the regulation]: [a] Should delivery be made as early as convenient or is anytime prior to the guaranteed delivery time satisfactory? [b] Should city delivery carriers deviate from their routes to achieve delivery prior to the guaranteed delivery time? [c] Should rural/HCR carriers deviate from their routes to achieve delivery prior to the guaranteed time?