

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-83, 84, 89, 92, 93, 96, 97, 98(A), 99(A-J),
100(A-I), 107(A-D, V, CC-DD), 111, 115, and 123)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBP/USPS-83, 84, 89, 92, 93, 96, 97, 98(a), 99(a-j), 100(a-i), 107(a-d, v, cc-dd), 111, 115, and 123, filed on March 23, 2000. The Postal Service's responses to interrogatories DBP/USPS-94 and 110 were filed separately today. Objections were filed to interrogatories DBP/USPS-98(b-e), 107(o-q, u, and y-z), 108, 109, 112(a-i), 122, 125(b), 129, 130, 131(a), 132(a), 133(a), and 134(a). Interrogatories DBP/USPS-106(c-e), 117(j-k), 118(h-i), and 121(a-i, l-t) have been redirected to witness Davis. Interrogatories DBP/USPS-81-82, 85-88, 102, 105-106, 107(e-n, r-t, w-x, aa-bb, ee-ii), 117(a-i, l-m), 118(a-g, j-k), 119(k), 124-125(a), 131(b-d), 132(b-d), 133(b-d), and 134(b-d) have been redirected to witness Mayo. Interrogatories DBP/USPS-90, 91, 95, 112(j-l), 113, 114, 116, 119(a-j), and 120 have been redirected to witness Kaneer. Responses to interrogatories DBP/USPS-101, 103, 104, 110, 126, 127, and 128 are not included.

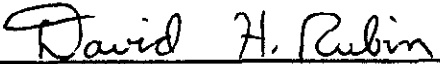
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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DBP/USPS-83

Witness 30, and perhaps others, utilizes the phrase "added contingency," or words of a similar import, to determine a final rate [See USPS-T-39 footnote 64 as an example]. [a] Please define and explain this phrase. [b] How has the amount of the added contingency been determined?

RESPONSE:

Please see the testimony of witness Tayman, pages 43-44.

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DBP/USPS-84

- [a] What percentage of postal facilities that have post office boxes provide access to their box section 24 hours a day?
- [b] Confirm, or explain if you are unable to do so, that these facilities fall into both those that have an employee on duty at the facility and those that do not.
- [c] What percentage of the total number of post office boxes are accessible 24 hours a day?
- [d] Confirm that, as a minimum, the box section in a post office should be accessible to the public at all times that a postal employee is on duty at the facility [which in many cases will be greater than the normal hours of retail operation]. If you are unable to confirm, please explain and discuss and provide specific information as to why it cannot be accomplished.
- [e] Provide information on the reasons which would allow a postal facility to permit access to the post office box section during times when there are no postal employees on duty in the facility.
- [f] Please provide copies of any directives or instructions that have been issued, if any, regarding the guidelines for determining whether a box section can be open when no postal employee is on duty.

RESPONSE:

- a. This information has not been compiled, and if available would quickly become outdated. The Postal Service tries to accommodate customer preferences, so if demand for a 24-hour lobby is recognized, an effort to provide one in a given general vicinity is made.
- b. Some lobbies containing post office boxes are open to the public 24 hours per day, and most of these probably do not have employees on duty all of that time. Decisions regarding when a given facility is open are made by local postal officials in light of local conditions, particularly security of individuals, the facility, and the mail. Local decisions regarding when unattended lobbies are open also vary over time as customer demand is balanced against the need for security

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and safety. Many customers have access to a 24-hour lobby in their general vicinity, even if not at their closest or most convenient choice of facilities.

- c. This information has not been compiled.
- d. Not confirmed. The presence of a single employee in a facility does not mean that the facility's security is necessarily sufficient to warrant opening a lobby. Where feasible, the Postal Operations Manual does express a preference that lobbies be open when a facility is staffed. POM § 126.44. However, the POM contains operative guidelines for postal operations as opposed to formal requirements. Moreover, with the necessities for conserving costs and staff hours and often little customer demand, a mandatory policy would be unwarranted. See also, the response to part (b).
- e-f. See POM § 841.74; see also, the response to part (b).

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REDIRECTED FROM THE POSTAL SERVICE**

DBP/USPS-89 [a] Please confirm, or discuss and explain if you are unable to, that there are a number of post offices where there are two or more separate facilities having post office box service while being under the jurisdiction of the same Postmaster. For each of the following situations of multiple box sections under the same Postmaster, advise whether the fee determination was performed for all of the separate facilities as a group or for each facility separately [b] Main post office and a branch with the same ZIP Code [c] Main post office and a station with the same ZIP Code [d] Main post office and an annex facility in the same area and with the same ZIP Code [e] Main post office and a CPU with the same ZIP Code [f] Same as subpart b except with different ZIP Codes [g] Same as subpart c except with different ZIP Codes [h] Same as subpart d except with different ZIP Codes [i] Same as subpart e except with different ZIP Codes [j] In those instances where two or more separate facilities had a single rate established for them, please explain the procedure that was utilized. [k] Confirm, or explain if you are unable to do so, that there are facilities where post office boxes have a separate ZIP Code from the street addresses. [l] How will this condition affect the determination of box rents?

Response:

[a] Confirmed that a post office and postmaster may have administrative responsibility for subordinate stations, branches, contract units, etc.

[b-e] In cases where a ZIP Code has more than one facility, all facilities were treated the same based on witness Yezer's rental value estimate for the facility having the most boxes.

[f-i] Each facility would be treated separately, since classifications are specified by ZIP Code.

[j] See response to [b-e]

[k] Confirmed.

[l] Witness Yezer estimated cost per square foot values for the physical facilities by their ZIP Code. These estimates of space costs by physical ZIP Code were used, in part, to specify the proposed fee groups. Box sections located inside a facility, having a non-physical ZIP Code that is numerically different from that of the facility in which they are located, are assigned the cost per square foot for the physical ZIP Code. In simple terms, the ZIP Code of the building is utilized, not the ZIP Codes of the boxes located inside.

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DBP/USPS-92.

- [a] What is the distinction between a Group B facility [B2] and a Group C facility [C3/C4/C5]? Are there any characteristics, other than cost, that separate them?
- [b] Confirm, or explain and discuss if you are not able to confirm, that Groups B2 and C3/C4/C5 rates apply to all facilities that have city delivery service and that this is the only definition for the group and that the determination of which of the four groups will be based on a cost factor.
- [c] Confirm, or explain and discuss if you are not able to confirm, that Groups D5/D6 rates apply to all facilities that do not have city delivery service but do have either rural or HCR service operating out of that facility and that this is the only definition for the group and that the determination of which of the two groups will be based on a cost factor.
- [d] Confirm, or explain and discuss if you are not able to confirm, that Group E rates apply to those boxes that are located at facilities whose only delivery method is through the box or by General Delivery [unless the customer is eligible to receive delivery service from some other office - in which case Group D rates will apply].
- [e] Which DMM Section covers each of the two items referred to in subpart d?

RESPONSE:

- a-c. Current fee groups, as well as cost per square foot, are used to specify the fee groups proposed in this docket; see witness Kaneer's testimony, USPS-T-40 at 13. When recommending establishment in Docket No. R90-1 of Groups B and C, the Commission stated that the goal was "to recognize the disparity in space costs" in response to the Postal Service's proposal to add "geographic location as a third criterion for boxes with city carrier service." PRC Op., R90-1, Vol. 1 at V-400.
- d. Not confirmed. Currently, nondelivery post offices – those independent post offices offering no form of carrier delivery service – are subject to Group D post office box fees at their main and subordinate facilities. Group E fees are applied to individual post office box customers, based on their physical location and ineligibility for carrier delivery service. Customers who apply for post office box

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service at any facility may be entitled to Group E fees at that office if ineligibility for carrier delivery service is based upon a decision by the Postal Service.

- e. DMM § D910.5.1.a, b and c.

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DBP/USPS-93.

- [a] How is the geographic delivery ZIP Code boundary of a non-city delivery post office determined?
- [b] How is the geographic delivery ZIP Code boundary of a non-delivery post office determined?
- [c] Define and explain the term, "carrier delivery via an out-of-bounds delivery receptacle" as it appears in DMM Section D910.5.1a/b.
- [d] If I live in the same building as a non-delivery post office is situated, what box rent group to I pay?
- [e] Same as subpart d except a different post office has a rural or HCR route that passes the building.
- [f] Confirm, or discuss and explain if you are not able to confirm, that I may place a rural/HCR box anywhere in the country [assuming that I receive the permission of the property owner] and therefore obtain mail delivery from the rural/HCR carrier when they pass by the box?
- [g] If you confirm subpart f, explain who would be eligible to receive a Group E box?
- [h] What are the rules for extending a city delivery, rural, or HCR route to cover additional delivery points?

RESPONSE:

- a-b. The geographic delivery ZIP Code boundary of a post office is primarily a consequence of the street assignments to that ZIP Code. However, other factors, including physical topography and municipal relationships, may be taken into consideration as well. For example, a limited access highway may be utilized as a boundary between two ZIP Codes, due to its operational impact on carrier access and travel patterns. Developing territory on the perimeter of existing delivery areas may be incorporated into a ZIP Code, whether for reasons of municipal identity or operational convenience. By definition, a nondelivery post office has no delivery area, and therefore no geographic ZIP Code boundary. Instead, it has a ZIP Code reflecting the post office, any box section and its administrative functions.
- c. See POM §§ 642.3 and 653.1, Note.

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- d. The question contains insufficient information to permit answering it. However, if another post office provides carrier delivery service to your residence in the building, and you seek a box at the nondelivery post office, you pay the Group D fee. If you seek a box at another post office, you pay the fee appropriate to that post office (Group A, B, C or D). If no post office provides carrier delivery to your residence, you can obtain a Group E box at the nondelivery post office.
- e. A carrier route may "pass" a building, but not be authorized to serve it as a delivery point. If the territory is assigned to the carrier route for delivery purposes (or will be assigned and delivered, should the customer request carrier service), then the box fee appropriate for the post office (Group D) would be paid. If the Postal Service declines to provide carrier service from any carrier route, you will be eligible for a Group E box.
- f. You may not place a box "anywhere in the country" and receive delivery service, with or without landowner permission. Delivery service is provided to eligible residential or business locations. Receptacles for those physical locations must be associated with the service area they exist within.
- g. If your residential or business location is ineligible for carrier delivery service, a post office serving territory in the vicinity may offer you the opportunity to erect a box on a carrier's line of travel. If you decline, you will be provided a Group E box.
- h. See POM §§ 642, 644, 653, 654, and 666.

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DBP/USPS-96 [a] Confirm, or discuss and explain if you are not able to confirm, that the Postal Service makes a business decision to not process a service in accordance with its own rules and advertisements to the public when there is a belief that it would cost more money to comply with the regulations than the penalty for not doing so. Some specific examples for which a specific individual response are: [b] Express Mail which will be impossible to achieve delivery by the guaranteed time will be accepted and the price of making the refund, if requested, is less than it would be to either fix the problem or increase the level of transportation/service. [c] Registered Mail which is handled as ordinary First-Class Mail as noted in the Inspection Service Area Coordination Audit Report on Special Services [USPS-LR-I-200] and the cost of paying a claim will be less than the cost to provide the proper handling of the mail. [d] Return Receipts which are completed by the addressee at a time after delivery without supervision of the Postal Service as mandated because it is easier for the Postal Service to complete them that way and save costs on the assumption that that the mailer will be unaware of the level of service, or non-service, that has been received [e] Insured Mail receives no special protection or handling enroute other than to have the addressee sign for it on the assumption that it is less expensive to pay the claims than to provide the service. [f] Normal collection times are not made as mandated in the POM because it is felt that it would cost too many hours to make the collections that are mandated in the POM and the belief that the mailing public will receive a satisfactory level of service even though it does not meet the requirements. [g] Same as subpart f except because it is felt that it would impact the arrival mail profile at the P&DC and would either require a capital expenditure for more equipment or a greater number of work hours than desired to process the mail for committed delivery standards. [h] Regularly scheduled collection times and retail window service hours are reduced or eliminated in the days on or surrounding holidays because it is believed that it will be possible to save hours while not inconveniencing the public. [i] If a collection box has a posted time on it, can the post office not make the collection by releasing a press story of the reduction to the news media - please limit your response to non-emergency conditions? [j] For each of the subparts above, explain whether the public would perceive the Postal Service's regulations, advertising, and/or claims to be valid, truthful, and/or meaningful with respect to the actual service being rendered as opposed to the service mandated, advertised, or claimed. [k] What action should a customer take when they observe or experience one of the conditions described above, or for that matter, have any concern or complaint regarding the operation of the United States Postal Service. [l] What action should a customer take when they are unable to receive a comprehensive response within 14 days as mandated by Section 165.1 of the POM? [m] If a customer initially contacts a local Postmaster to resolve a complaint or concern and does not receive a comprehensive response as noted above, please provide a complete listing of the job titles, as well as the order to be followed, which the customer should then contact, for example, District Manager, Area Vice President, etc.

DBP/USPS-96 Response

Not confirmed. In designing or implementing its procedures and networks, the Postal Service does not employ an estimate – whether explicit or implicit – of the point at which the

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cost of improved service performance exceeds the costs of providing refunds or paying claims in response to service failures. Due to differences in local conditions, furthermore, there is no single answer to your inquiries regarding the appropriateness of certain local actions you cite or the public perceptions thereof. The Postal Service makes every effort to ensure that its policies and regulations are set forth in a straightforward manner, and that they accurately reflect the general conditions governing the provision of service for each product. However, it must be recognized that for an organization as large in size and scope as the Postal Service, that serves an extremely large and diverse nation, creation of an exhaustive set of such procedures is neither possible nor desirable. The Postal Service must maintain a balance between some level of centralized control over processes on the one hand, and local responsibility for financial and service performance and local autonomy for responding to local conditions on the other. Customers may direct unresolved complaints to the Postal Service's Consumer Advocate at Headquarters.

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DBP/USPS-97

[a] Confirm, or explain and discuss if you are not able to confirm, that the EXFC program has accomplished the following three results, [1] It has allowed the Postal Service to find the root causes for many of the items which delay the mail and correct them so as to improve the service. [2] It has caused the Postal Service to engage in a high cost system for error correction. For example, before EXFC was in place, a post office receiving a quantity of mail for another office in error, just sent the mail back to the P&DC for delivery on the following day. Now the mail will be specially brought over to the other office so that it can be delivered on the scheduled day. and [3] It has caused post offices to come up with creative methods of manipulating the EXFC score such as a post office making collections before 5 PM at box locations that are mandated to be collected at 5 PM or later so as to achieve a better mail arrival profile at the P&DC and therefore improve the likelihood of a higher EXFC score. [b] Provide and explain any other benefits of the EXFC program.

RESPONSE:

- (a) Confirmed, as to part (1). Not confirmed, as to parts (2) or (3). Part (2) cannot be confirmed because it is based upon faulty assumptions and generalizations about pre- and post-EXFC sortation error correction practices. Part (3) cannot be confirmed, because it assumes that EXFC causes "manipulative" behavior on the part of individual postal employees. EXFC is not the cause of any "manipulative" behavior on the part of postal employees.
- (b) A benefit of the EXFC program is that it gives an indication of service quality that postal management and employees can strive to improve and that the public can judge.

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DBP/USPS-98

[a] Please confirm, or discuss and explain if you are not able to confirm, that compensation for many Postal Service Installation Heads is affected by the EXFC results for their area of responsibility. [b] Other than the Installation Head [Postmaster / District Manager / etc.] provide a listing of the categories of Postal Service Managers whose compensation is affected by EXFC results. [c] Provide an explanation of the method by which the compensation is tied to the EXFC results. [d] Are all EXFC results utilized or is it limited to the overnight score only? [e] If only overnight, please explain why.

RESPONSE:

(a) Confirmed.

(b-e) Objections filed.

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DBP/USPS-99

[a] Confirm, or explain and discuss if you are not able to confirm, that EXFC is a measurement for First-Class Mail only. [b] Confirm, or explain and discuss if you are not able to confirm, that all EXFC test mail is prepaid at the single piece rate and is deposited in collection boxes. [c] Confirm, or explain and discuss if you are not able to confirm, that EXFC pieces are not sent by any of the presorted / automation rates. [d] Provide the results of any studies that have been made showing the extent to which the delivery times of presorted / automation rate First-Class Mail is achieved. [e] Provide the results of any studies that have been made which would allow the EXFC results to serve as a proxy for the automated / presorted mail. [f] Does the EXFC program check all types of First-Class Mail / by shape such as letter, flat, SPR etc., / by method of addressing such as printed, typewritten, or hand written / by method of postage prepayment such as stamped or metered? [g] What percentage of the country's total mail volume [of EXFC type of mail] is tested by the EXFC program? [h] Does the EXFC program make an effort to sample the origin-destination pairs, shape, method of addressing, and method of postage prepayment in proportion to the volume that exists within the entire universe? If not, why not. If so, provide copies of any study. If necessary, separate and discuss each separate criteria. [i] In the event that a post office wishes to eliminate collection from a collection box on a particular date and time, such as might occur on a holiday or a day surrounding a holiday, are they able to notify PriceWaterhouse in advance so that they will not deposit EXFC mail for that omitted collection time [even though the box is posted with that time]? [j] If the response to subpart i is yes, please provide a listing of all instances in which this was done in the past year.

RESPONSE:

- (a) Confirmed.
- (b) All of the principal single-piece First-Class Mail entry modes are used.
- (c) Confirmed.
- (d&e) None exist.
- (f) Yes.
- (g) Considerably less than one percent.
- (h) No. It is not the objective of the program to absolutely, perfectly replicate every aspect of the First-Class Mail stream.
- (i) Such activity is not consistent with EXFC.
- (j) Not applicable.

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DBP/USPS-100

[a] Confirm that both post cards and stamped cards may be mailed at the same 20-cent postage rate [proposed to be 21-cents]. [b] What is the average cost for acceptance, processing, and delivering a post card? [c] What is the average cost for acceptance, processing, and delivering a stamped card? [d] If separate data is not available, please explain why it is not collected. [e] Provide the existing and proposed cost coverage for the entire First-Class Mail card subclass and for the single-piece First-Class Mail card rates. [f] Confirm that, in general, the cost for handling post cards would be higher than for handling stamped cards. [g] Confirm that the following characteristics would tend to indicate that stamped cards would have a lower cost than post cards: they are more uniform in size, they are more likely to have a printed address, they normally utilize the entire front of the card for the address. [h] Confirm that the following characteristics would tend to indicate that post cards would have a higher cost than stamped cards: they vary in size [between the authorized limits], they tend to have a glossy surface - both on the front and particularly on the reverse side, they are more likely to be hand addressed, and the left side of the card is normally utilized for a message rather than an address. [i] Explain and discuss any subparts that you are not able to confirm.

RESPONSE:

(a) Confirmed.

(b&c) The IOCS can only be used to obtain costs for single-piece cards in total.

See USPS LR I-181. It is not possible to obtain separate costs for postcards or stamped cards. As a result, these data are not available.

(d) No need sufficient to warrant doing so has developed.

(e) See Exhibits USPS-32A and B.

(f-i) This cannot be confirmed because no studies have been undertaken to evaluate the specific mail characteristics and, therefore, the costs of processing postcards vs. stamped cards.

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DBP/USPS-107. [a] Confirm that if I have merchandise weighing under thirteen ounces that I may either utilize First-Class Mail or Priority Mail or, as being proposed, Package Services. Neglect the ability to utilize Express Mail in these examples. **[b]** Confirm that if I have merchandise weighing between thirteen and sixteen ounces that it is the same as subpart a, except that I may not use First-Class Mail. **[c]** Confirm that if I have merchandise weighing over sixteen ounces that I may either utilize Package Services or Priority Mail. **[d]** Confirm, or explain if you are not able to do so, that a comparison of all of the characteristics of Package Services vs. Priority Mail, will show that, neglecting the price, Priority Mail will always be equal to or better than Package Services, i.e., the delivery standard for Priority Mail is faster, any parcel between 1 and 70 pounds [proposed to be any parcel up to 70 pounds] may be sent by either service with the same level of preparation, the place of mailing is either the same or better for Priority Mail, Priority Mail will have free forwarding and return, etc.

[v] What percentage of all parcels sent by Package Services or Priority Mail fall into those rate cells provided in response to subpart t?

[cc] Confirm that the rate for Express Mail will always be greater than that for Priority Mail. **[dd]** Confirm that the level of Service for Express Mail will always be greater than or equal to that for Priority Mail.

RESPONSE:

[a] Confirmed.

[b] Confirmed.

[c] Confirmed.

[d] Confirmed.

[v] The requested analysis has not been performed.

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[cc] Confirmed.

[dd] Confirmed.

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DBP/USPS-111. Refer to the response to DFC/USPS-T34-49, please provide a copy of the latest available PETE results.

RESPONSE:

See response to UPS/USPS-T34-26.

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DBP/USPS-115.

- [a] Regarding the response to DBP/USPS-14, confirm, or explain and discuss if you are not able to confirm, that the level of service for the various delivery categories is the same for all offices in the country.
- [b] Confirm, or explain and discuss if you are not able to confirm, that having a delivery made on a given day of the year contemplates that there will be new mail arriving at that office for delivery.
- [c] Please confirm, or explain and discuss if you are not able to confirm, that the specific authority to have less than six days a week delivery relates to both on a permanent/semi-permanent basis as well as on a temporary or seasonal basis.
- [d] Please reevaluate your POM reference under City Delivery Routes.
- [e] Please provide regulatory reference which authorizes seasonal city delivery routes.
- [f] Provide a definition for the term seasonal city delivery route which includes both the range of days per week and the weeks per year that will occur.
- [g] Are all business customers who are either open on Saturday or have a mail receptacle which may be accessed by the carrier on a Saturday entitled to receive city delivery [unless they specifically request non-delivery on Saturday]?
- [h] If not, why not?
- [i [sic]] What is the official title of the Area Manager?
- [j] With respect to delivery to post office boxes, provide a regulatory reference which authorizes service less than six days a week.
- [k] Your response to the level of service at post office boxes states that service will be available when the post office is open and the post office box section is accessible. Is it required to have the post office open and the box section accessible six days a week?
- [l] With respect to response [3], is it required to have the post office lobby open six days a week?
- [m] If your response to subparts k and/or l is no, provide the reasons when it would not be and the regulatory authority authorizing it.
- [n] Please enumerate the specifics of the limited authority that a Postmaster may have in those instances where it is mentioned.
- [o] Please confirm, or explain and discuss if you are not able to confirm, that response [2] when taken together with response [1] and potentially responses [4] and [5] could allow for carrier delivery on a given day when there is no delivery to post office boxes - for example, even though the post office box section is not open and accessible on a Saturday [the most likely day for this to occur] carrier delivery must still be made that day.
- [p] If your response to subpart o is confirmed, explain how one could consider post office box delivery to be a high value service when compared to carrier delivery

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since carrier delivery would occur on more days of the week than post office box delivery.

- [q] Please provide the definition of the first word in your response, "Generally". Does it mean that there will always be six day a week delivery at all facilities and types of addresses unless a specific exception has been provided in your response? If not, provide all of the other conditions where six day a week delivery is not available.
- [r] Please explain why it was necessary to utilize the word generally in your response for both post office boxes and General Delivery. Provide the specifics of any conditions which would allow for less than six days a week delivery.

RESPONSE:

- a. Unable to confirm. This question is manifestly unclear. Postal regulations apply across the country, but service and delivery standards nonetheless vary from location to location.
- b. Not confirmed. Arrival of mail at a facility, its further sortation, and its delivery are separate and independent actions. No inherent same day link exists among these three. Mail could arrive for delivery at or from an office in several distinct ways: by scheduled transportation of mail from a larger facility, by customers entering it, by carriers as they return from their routes, or by collection routes. In the smallest facilities, no mail may arrive for delivery at all. Sortation schedules depend upon the workload in the office, which is often cyclical. While most delivery is a once-a-day proposition, offices in business areas may not have scheduled carrier routes on Saturdays, and if they do not open they also are unlikely to put mail in post office boxes.
- c. Unable to confirm. Needs for delivery are reviewed, with modifications made as appropriate, over time.
- d. No specific cite should have been provided.

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- e-f. The Postal Service applies the criteria in POM § 641.2 to effect seasonal route adjustments. No definition exists that is specific to days of the week or specific weeks.
- g. That is generally what is expected and provided. However, no specific provision of law makes appears to make this an entitlement.
- h. Not applicable.
- i. Insufficient information is provided to permit formulation of an answer to this question.
- j-k. No specific requirement that a facility be open six days a week exists. DMM § 125.22 reflects the fact that days and hours of operation are adjusted to reflect customer demand, from which lies the inference that specific local conditions vary. While DMM Exhibit 125.22 indicates that consecutive days without service should be avoided, the response to DBP/USPS-14 also indicates circumstances in which this may nonetheless occur. Saturday delivery to post office boxes may not be justified when there is little customer demand for the mail until the following Monday. Even if mail is placed in post office boxes on Saturdays, if the lobby is not open, access to boxes may not be available.
- l. No. Main post offices and other postal units in business areas are usually open during the hours kept by that business community. Window service is provided on Saturday if there is demonstrated need. At units serving business areas, or facilities serving communities where many residents leave on weekends, retail service may be closed if service is available at other postal units, contract stations, or self-service postal centers.
- m. See the response to DBP/USPS-84.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID B. POPKIN**

- n. As indicated in those responses, postmasters would have authority when and on the same terms as it is delegated to them by district managers.
- o. The theoretical potential is confirmed. Moreover, it probably is not that rare for a station or branch to be closed on Saturday because it serves primarily a business clientele when residential delivery is nonetheless provided in the area.
- p. This question inappropriately elevates an inherently local matter over the national level attributes of post office box service used to set fees. A specific customer's decision about obtaining post office box service would presumably be informed by a host of individualistic and local considerations. It would not be surprising for a customer obtaining post office box service in a business area where there is no Saturday delivery to attach low value to Saturday delivery.
- q-r. The word "generally" quite capably speaks for itself. Information on specific local conditions is not available. See also the responses to DBP/USPS-14, DFC/USPS-T39-10, and other parts of this interrogatory.

RESPONSES OF UNITED STATES POSTAL SERVICE
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DBP/USPS-123

Please respond to the following questions under the headings and contexts of DBP/USPS-65 as follows:

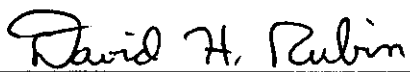
- (a) Confirm that the proper postage is a function of the size of the piece (namely one ounce pieces outside a certain range require a surcharge).
- (b) Confirm that this would require that the carrier have a ruler or template to determine compliance.
- (c) Confirm that carriers do not normally carry rulers or templates with them to the field.

RESPONSE:

- (a) Confirmed.
- (b) Confirmed.
- (c) The Postal Service has not conducted a survey to determine the frequency with which carriers take their templates (or rulers) with them while out of the office on their routes.

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.


David H. Rubin

David H. Rubin

475 L'Enfant Plaza West, SW
Washington, DC 20260-1137
April 6, 2000