### 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

## Docket No. R2000-1

## RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS ROBINSON TO INTERROGATORY OF ASSOCIATION OF PRIORITY MAIL USERS (APMU/USPS-T34-54)

The United States Postal Service hereby provides the response of witness

Robinson to the following interrogatory of the Association of Priority Mail Users:

APMU/USPS-T34-44-54, filed on March 31, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 10, 2000

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON TO INTERROGATORIES OF THE ASSOCIATION OF PRIORITY MAIL USERS

#### APMU/USPS-T34-54.

Please refer to your response to APMU/USPS-T34-40(a), where you state that "Emery is required to provide a scan of Delivery Confirmation barcodes on entry into the originating and/or destinating processing operations at a PMPC."

- a. What exactly does "entry into the originating . . . processing operations" mean? Does this mean on receipt?
- b. What exactly does "entry into the . . . destinating processing operations" mean? Does this mean at turn over of the piece to the Postal Service?
- c. For Priority Mail pieces both originating and destinating within the PMPC network service area, where are such pieces also scanned by the Postal Service?
- d. For Priority Mail pieces originating inside but destinating outside the PMPC network service area, where are such pieces also scanned by the Postal Service?
- e. For Priority Mail pieces originating outside and destinating inside the PMPC network service area, where are such pieces also scanned by the Postal Service?

#### **RESPONSE:**

a. No, I am informed that "entry into the originating . . . processing operations" does not mean "on receipt." I am further informed that PMPCs are organized to have separate operations for processing mail that either originated in the PMPC's service area ("originating" mail) or is required to be delivered within the PMPC's service area ("destinating" mail.) "On entry into the originating . . . processing operations" refers to the point in a PMPC's operations where a piece of mail which originated within the PMPC's service area is first taken into the PMPC's originating mail operations area, normally during the primary sort of originating mail.

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- b. No, I am informed that "entry into the ... destinating processing operations" does not mean "at turn over of the piece to the Postal Service." I am further informed that PMPCs are organized to have separate operations for processing mail that either originated in the PMPC's service area ("originating" mail) or is required to be delivered within the PMPC's service area ("destinating" mail). "On entry into the ... destinating processing operations" refers to the point in a PMPC's operations where a piece of mail which is required to be delivered within the PMPC's service area is first taken into the PMPC's destinating mail operations area, normally during the primary sort of destinating mail.
- c. e. All Delivery Confirmation pieces are scanned at delivery. Delivery
  Confirmation pieces that are accepted at a postal retail counter are scanned
  at acceptance. As described in parts (a) and (b), Delivery Confirmation
  pieces may also receive en-route scan at some PMPCs.

#### DECLARATION

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

una Kobinson

MAURA ROBINSON

Dated: 4.10.2000.

# **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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 10, 2000

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