

BEFORE THE

POSTAL RATE COMMISSION

WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2000]

DOCKET NO. R2000-1

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS 157-195]

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. **PLEASE EXPLAIN AND DISCUSS ALL INSTANCES WHERE IT IS NOT POSSIBLE TO CONFIRM THE DESIRED STATEMENT RATHER THAN JUST STATED THAT IT IS NOT CONFIRMED.** If the witness does not have the expertise to provide an accurate response to the interrogatory, please refer it to a witness or USPS employee that does.

April 10, 2000

Respectfully submitted,



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

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DBP/USPS-157 Refer to the response to DBP/USPS-44. [a] Confirm that the city, state, and ZIP Code that the window clerk writes in the top box will be the same as the customer or window clerk writes in the bottom line of the bottom boxes. [b] Will the POS terminal insert the data automatically? If so, explain the procedure. [c] What purpose is served by having the city, state, and ZIP Code shown twice? [d] By how much time will this increase the window time?

DBP/USPS-158 Refer to the response to DBP/USPS-45. [a] I am confused by the response to subpart a. I thought that the printed name was supposed to be a printed version of the signature to provide a value of knowing the name associated with an illegible signature. Please provide specific examples where individual #1 will print his/her name in

Box A and while individual #2 will sign the form in Box C. [b] What additional information do you require before you can determine why I am not receiving the proper level of service for the twelve return receipts that I recently received back? [c] Explain why showing only the month and date will be sufficient to indicate the date of delivery. [d] Confirm that the date shown in a cancellation and a round dater will show the year in addition to the month and date. [e] Your response to subparts e and f states that the year of delivery would not have to be printed for the date to be correct. The question is not whether the date is correct but whether it is a complete date. Please reevaluate. [f] Refer to your responses to subparts e, f, and p and explain why this would provide a high value of service to only show the month and date of delivery [without showing the year]. [g] I am confused by the response to subpart h. if all the mailer had to do was compare the name of the addressee with the signature and name of the person receiving the article, there would be no purpose for the boxes in Box C. Provide all instances where these boxes will serve a useful purpose. [h] The response to subpart j is confusing. The second line in Box D states, "If YES, enter delivery address below." If one doesn't check the YES box, how will they know to complete the new delivery address? [i] Please reevaluate the response to subparts j and t in light of the preceding as well as your response to DFC/USPS-T39-5[a]. [j] My original subpart z was misread. I am interested in knowing the specific items that a mailer would have to do, such as, retrieve original mailing receipt / take to post office / obtain Form 3811-A / complete Form 3811-A / wait for return of completed Form 3811-A / etc. Please respond to original question. [k] My original subpart gg was misread. My concern was that the necessity of the mailer having to go through all of the effort and delay to obtain a duplicate return receipt would reduce the value of the service to that mailer. Please respond to the original question.

DBP/USPS-159 Please refer to your response to DBP/USPS-47[f]. [a] Confirm that some mailers may be interested in knowing that there was a change of address. [b] Confirm that it is no longer possible to purchase return receipt service showing the address where the article was delivered.

DBP/USPS-160 Please refer to your response to DBP/USPS-48[j through p]. [a] Please advise whether the Return Receipt must be completed at the time of delivery [the time at which the custody of the mail is transferred from the control of the United States Postal

Service to the control of the addressee] for each of the categories of addressees as noted.  
[b] Please provide the appropriate regulatory reference.

DBP/USPS-161 Please refer to your response to DBP/USPS-49. It would appear that witness Plunkett is taking the term signature to mean the signature and date literally and not any of the items related to the signature such as the printed name, checking of the boxes, etc. Please either confirm or reanswer the interrogatory.

DBP/USPS-162 Please refer to your response to DBP/USPS-50[d/e]. How does the Postal Service identify the term federal and state agency for purposes of this rule?

DBP/USPS-163 Please refer to your response to DBP/USPS-51[a]. Please describe the effort taken by the Postal Service to achieve this goal. [b] What efforts are taken to correct reports of failure to meet this goal? [c] What studies are made to determine the extent to which this goal is met?

DBP/USPS-164 Please refer to your response to DBP/USPS-54[o]. Please reanswer this question in light of the same misreading that was referred to in DBP/USPS-158[kk] above.

DBP/USPS-165 Please refer to your response to DBP/USPS-55. Please advise the specific responses to DFC/USPS-T10-8 which respond to each of the specific subparts that I asked in my original inquiry. For any subparts that you are not able to provide this reference, please provide a responsive answer to my interrogatory.

DBP/USPS-166 Please refer to your responses to DBP/USPS-65 and DBP/USPS-123. [a] Are carriers required to riffle through the DPS mail prior to departing the office? [b] Is it a normal practice for carriers to riffle through the DPS mail prior to departing the office? [c] How much time is allocated for this evaluation? [d] What are the specific items that the carrier is looking for during this in-office riffling of the mail? [e] Are carriers required to carry accurate scales with them while delivering mail on their routes? [f] Is it common practice for carriers to carry accurate scales with them while delivering mail on their routes? [g] Are carriers required to carry charts showing the values of the various non-denominated stamps

with them while delivering mail on their routes? [h] Is it common practice for carriers to carry these charts with them while delivering mail on their routes? [i] Are carriers required to carry templates with them to determine the requirement for a single ounce surcharge while delivering mail on their routes? [j] Is it common practice for carriers to carry these templates with them while delivering mail on their routes? [k] If at the point at which a carrier is about to deliver a letter to an addressee, the carrier has a question regarding whether a letter has the proper postage on it [either because of its weight, proper size, and/or the value of non-denominated stamps], should the carrier deliver the letter as is, conduct an accurate on-the-spot evaluation of the proper postage required [i.e., use an accurate scale, template, chart, etc.], or return the letter to the office for complete evaluation? [l] If the letter is returned to the office for complete evaluation, should it be delivered the same day or will it be acceptable to deliver it the following delivery date? [m] What action should the carrier take if it is determined that the article is shortpaid [to both collect and account for the funds collected?

DBP/USPS-167 Please refer to your response to DBP/USPS-67[c]. Your response is confusing since you state that District Manager rather the COO/EVP approval is appropriate and that you indicate that no exceptions have been approved by the COO/EVP. [a] Please clarify and reanswer if necessary. [b] If District Manager approval is required, will the POM be corrected and have any exceptions been approved by a District Manager?

DBP/USPS-168 Please refer to your response to DBP/USPS-68. [a] The requests for level of confidence referred to in subparts c and f refers to a mathematical statistical calculation, such as there is a 95% likelihood that the value will be three minutes plus or minus one minute, and not to your personal belief. Please provide the two desired mathematical calculations. [b] Once the two mathematical calculations have been provided, please explain why you feel that the calculated level of confidence is appropriate. [c] Please clarify your response to subpart k in light of your response to subpart h. [d] Please indicate the number of vacation days per year that employees are entitled to.

DBP/USPS-169 Please refer to your response to DBP/USPS-69. [a] Please explain why these mailings encourage the use of Certificates of Mailing for tax returns sent to IRS when

the tax laws specifically state that they will not be accepted by IRS? [b] Was this researched prior to making the claim on the mailing? [c] If not, why not? [d] Please explain why these mailings encourage the use of Insured Mail for tax returns sent to IRS when tax returns are First-Class Mail and not merchandise and therefore may not be insured.

DBP/USPS-170 Please refer to your response to DBP/USPS-75. [a] If I were to change my original subparts a and b to state that with the exception to retail window hours on a Sunday, does the USPS have a requirement .... , what would the response to subpart a and b be? [b] If not, an unqualified yes, please provide all instances where it would not be so. [c] If an article is mailed on at a retail window on Sunday and a date is noted on the article such as might be on the Express Mail label, the postmarking of the flaps on a Registered Mail article, the PVI strip, etc. or is noted on a mailing receipt, is the date shown as Sunday or as the following business day? [d] Please provide a comprehensive listing of those instances where it would not be possible to meet the conditions specified in subpart c. [e] If an article was not processed on the same day as it was collected, how would that affect the EXFC results?

DBP/USPS-171 Please refer to your response to DBP/USPS-76[d/e]. These subparts requested data on costs which was not provided. Please provide.

DBP/USPS-172 Please refer to your response to DBP/USPS-77[f]. [a] Once a specific five-digit ZIP Code is utilized for one or more "No Office Point" address, such as 99950 in your example in subpart e, is that same five-digit ZIP Code utilized for any non-No Office Point address? [b] If so, provide specific details. [c] Provide a complete listing of all five-digit ZIP Codes, and their associated post office name, that are utilized for one or more "No Office Point" addresses. [d] Is the No Office Point concept utilized anywhere else besides Alaska? If no, please provide details. [e] What Fee Group is charged for the rental of the post office box referred to in a No Office Point address? [f] Is there a physical box associated with the Post Office Box referenced in a No Office Point address? [g] At what point in the chain [starting when the article is mailed and ending when the addressee actually obtains the article] does the custody of the mail transfer out of the control of the United States Postal Service to the control of the addressee or agent? [h] What costs

associated with this service are paid for by the USPS and what costs are paid for by the customer? [j] How are the costs paid for by the USPS accounted for in this rate case?

DBP/USPS-173 Please refer to your response to DBP/USPS-79[l]. [a] Please confirm that the usual instance for this type of delivery is with Certified Mail. [b] Please confirm that a manifest is typically prepared for all pieces of accountable mail that are being delivered regardless of whether a return receipt has been requested or not. [c] Please confirm that the purpose of this manifest is to document the receipt of all of the pieces of accountable mail. [d] Please confirm that this manifest is signed by the addressee at the time of delivery. [e] Is a separate manifest also provided which lists only those pieces of accountable mail on which a return receipt has been requested? [f] If not, please reanswer subpart l. [g] Please describe all uses that are made of this second manifest which lists only the pieces having a return receipt.

DBP/USPS-174 Please refer to your response to DBP/USPS-79[n]. While Witness Davis may not know to what extent the described practice may be permissible, there must be one employee of the USPS who does. If this practice is being utilized, then the costs of it must be accounted for in the service and if it is not being utilized then the costs should not be included. Please respond to the original subpart n and if appropriate to the succeeding subparts o, p, q, and r.

DBP/USPS-175 Please refer to your response to DBP/USPS-81. [a] I am somewhat confused by the response. Please provide details on the nature and number of the postal facilities with administrative functions that sell stamped cards to the public but yet do not provide mail collection service. [b] Please reanswer the original question if necessary.

DBP/USPS-176 Please refer to your response to DBP/USPS-82. [a] If the witness is changing the value from over \$100 to one cent and over, please explain how that can be considered not to be correction of an error. [b] Please respond to the original subpart a.

DBP/USPS-177 Please refer to your response to DBP/USPS-83. [a] Is the contingency applied equally across all of the various services? [b] If not, please advise the contingency for each of the services.

DBP/USPS-178 Please refer to your response to DBP/USPS-84. [a] Please provide an estimate of the response to the data requested in the original subparts a and c. [b] Do I understand that you are stating that the word "should" in the POM Section 126.44 is advisory rather than mandatory? [c] If so, what guidelines are established which would allow for not following the advise? [d] Are there facilities that normally only have one employee on duty during normal window service hours? [e] Are they allowed to discontinue window service and box access during those times? [f] Have any guidelines, other than that contained in POM Section 841.74, been provided as to the when box sections may be open when no employee is on duty? [g] If so, please provide.

DBP/USPS-179 Please refer to your response to DBP/USPS-92. Which DMM Section specifically indicates that a customer who is not entitled to free delivery is entitled to a free box [Fee Group E]?

DBP/USPS-180 Please refer to your response to DBP/USPS-94. [a] Please confirm that your responses indicate that delivery of an average piece of mail to a post office box will cost the Postal Service 14.19 cents less than delivery to a city delivery customer and 10.92 cents less than delivery to a rural route customer. [b] If not, please explain and discuss. [c] Please explain how these savings in costs are passed along to the post office box users.

DBP/USPS-181 Please refer to your response to DBP/USPS-99. [a] It appears that my original subpart g was misread. My question was not what percentage is found when dividing the number of EXFC pieces by the total number of First-Class Mail pieces existing [and multiplying by 100]. It related to the total number of pieces of mail that have a similar type, characteristic, and origin-destination pair compared to the total mail volume. For example, if the EXFC program accurately measured one ounce letters only, it would be the proportion of one ounce letters to the total number of letters. Please reanswer the original

question. [b] Please clarify your response to subpart h and advise what the objectives are with respect to accurately measuring the First-Class Mail service throughout the country.

DBP/USPS-182 Please refer to your response to DBP/USPS-105. [a] Please respond to subpart a if the word "claimed" is changed to "implied" and the word "would" is changed to "might". [b] If so, please respond to the original subpart b. [c] If not, please respond to the original subpart b with the first two words removed.

DBP/USPS-183 Please refer to your response to DBP/USPS-107. [a] Refer to your response to subpart h. Provide details why and under what circumstances the delivering employee will make this report. [b] Is there a requirement to do so. [c] Does any form require this reporting [is so, provide a copy]. [d] Please clarify your original response. [e] Please use your expertise to provide examples and a better response to subparts m, n, s, and t. A knowledgeable mailer is one who knows what the regulations, costs, and services are and makes educated decisions to achieve their goals.

DBP/USPS-184 Please refer to your response to DBP/USPS-110. [a] If a collection box has a 3 PM weekday collection time indicated on it, should a mailer expect that mail placed into the box at 2 PM Monday [not a holiday] will be collected and dispatched on Monday? [b] If a collection box has a 1 PM Saturday collection time indicated on it, should a mailer expect that mail placed into the box at 12 Noon Saturday [not a holiday] will be collected and dispatched on Saturday? [c] If a collection box has a 3 PM holiday collection time indicated on it, should a mailer expect that mail placed into the box at 1 PM on Presidents' Day will be collected and dispatched that day? [d] If your response to subparts a, b, or c is no, please explain why the mailer should not make that assumption. [e] Why should a mailer have any less expectations for a Sunday collection time shown on the box? [f] Confirm that Headquarters directives require if a collection time is shown on a box, the mail must be dispatched on that date. [g] Shouldn't mailers assume that all window clerks are knowledgeable? [h] If not, please explain. [i] In your response to subpart b, are you considering Saturday to be a weekday? [j] If not, why is mail processing fully available on Saturday?



DBP/USPS-185 Please refer to your response to DBP/USPS-114[d]. [a] What percentage did you calculate and how did you arrive at it. [b] Please provide insight as to why your percentage calculated are going to Group C. This response is aimed at evaluating the reasonableness of the \$10 value.

DBP/USPS-186 Please refer to your response to DBP/USPS-117. [a] With respect to the package referred to in subparts b and d, assume that it is sent Standard Mail B and is not marked Priority Mail or Express Mail. Please reanswer subparts b through f. [b] Please use your expertise to estimate the response to original subpart g. [c] Confirm that the special handling that you referred to on page 61 of your testimony relates to the special service known as special handling and not to the generic words of handling that is special. [d] Please respond to the original subpart h. [e] Which specific lines of pages 63 and 64 of your testimony provide the response to the specific questions in my interrogatory subparts l and m? [f] If you are not able to provide specific lines, please respond to the original subparts l and m. [g] Please explain your ability to claim that there is a reasonable assumption that the postage paid on a given article will be exactly what is required - no more and no less. [h] Is it permitted to overpay the postage on an article? [i] Is there a penalty for mailing an article with excess postage on it? [j] If the postage on an article is overpaid, will the article be returned to the sender to remove the excess postage? [k] If I present an article at a retail window with the postage overpaid, will the clerk refuse to accept the article unless I remove the excess postage? [l] Please provide me with a response to subpart i. your reference in the original response appears to be related to money order revenue and not insurance claims. Please provide the data in a similar format as the data provided in response to a similar question for Registered Mail in DBP/USPS-118[g].

DBP/USPS-187 Please refer to your response to DBP/USPS-118. [a] Subpart a has the word "generally" in it. Please use your expertise to indicate the general policy for handling most registered mail. I am not interested in the rare instance where a small office may be taken back with a \$25,000 letter. I am looking at the great majority of the total registered mail volume. Please reanswer subpart a. [b] Since you indicated in your response to the original subpart c that a mailer may overpay the postage, please respond to the original subpart d on how you can determine the insurance value, with absolute certainty. [c] Please

use your expertise to respond to the original subpart e. [d] Please use your expertise to respond to indicate the percentage of the total registered mail receives the referred to special security or handling that you indicate might occur in response to original subpart f. [e] Which specific lines of pages 125 and 126 of your testimony provide the response to the specific questions in my interrogatory subparts j and k? [f] If you are not able to provide specific lines, please respond to the original subparts j and k.

DBP/USPS-188 Please refer to your response to DBP/USPS-119[k]. [a] Please advise whether any studies have been conducted to support your belief that customers will be upset at receiving a large decrease in a specific fee. [b] Please furnish copies of any study. [c] Use your expertise to estimate what percentage of the mailers of this country would be upset if they received a large decrease in a proposed fee. [d] For example, the fee for a duplicate return receipt is being proposed to be cut in half due to a reduction in the cost. What percentage of the users of this service do you, with your expertise, feel will be upset at this large reduction in the fee for the service? [e] Why do you feel that users of this service will feel that this large 50% decrease will portend a larger increase in the future than a 25% decrease, for example, might? [f] Why do you feel that users of other services will look at this reduction and feel that their rates were higher because of it? [g] Use your expertise and estimate the percentage of users that might feel as indicated in subparts e and f above. [h] Explain why you feel that most to virtually all users of the service will not just take their large discount and "run with it to the bank".

DBP/USPS-189 Please refer to your response to DBP/USPS-121. [a] The request for level of confidence referred to in subpart c refers to a mathematical statistical calculation, such as there is a 95% likelihood that the value will be three minutes plus or minus one minute, and not to your personal belief. Please provide the desired mathematical calculation. [b] Once the mathematical calculation has been provided, please explain why you feel that the calculated level is appropriate. [c] Please furnish details as to the meaning of the column headings of the attachment to DBP/USPS-121[e] including the questions that were asked. [d] What is the full heading for the column that starts "6B newly"?

DBP/USPS-190 Please refer to your response to DBP/USPS-2. Please confirm that USPS Labels for Insured Mail now contain 4 alpha and 9 numerical digits and not the 20 numerical digits as noted in the response.

DBP/USPS-191 Please refer to your response to DBP/USPS-124. [a] Please explain why it is possible for USPS labels that are printed for Registered and Insured Mail to only have nine digits [plus four letters] - even though privately printed labels have 20 digits - and yet for Certified Mail labels, both the USPS and privately printed, it is required to have 20 digits for both of them. [b] Why is it not possible to have a shorter label for USPS printed Certified Mail labels as is done for Registered and Insured Mail. [c] Confirm that the electronic data capture will work for both the shorter Registered and Insured Mail USPS labels and the longer privately printed labels. [d] Specifically explain why it requires the longer label for Certified Mail labels. [e] Confirm that the product code is indicated by the first two letters of the USPS printed Insured and Registered Mail labels. [f] Please provide a breakdown of the number of digits that are used for each purpose in the USPS printed Certified Mail label and their position in the 20-digit string. As I understand it, two digits are used for product code, five digits are used for the Julian date, eight digits are used for the article number, and one digit is used for the check digit. That accounts for 16 of the 20 digits. [g] Why is it not possible to have a record kept of the dates that USPS printed Certified Mail labels rather than printing them on every label so that mailers and postal employees will not have to write this long number every time? [h] Why isn't there a similar need to know the date that USPS printed Registered and Insured Mail labels were printed? [i] Please reanswer the original subparts h and i if I limit the response to USPS printed labels. [j] The response to original subparts l and m is not consistent. If there are employees who assign numbers now, then they must know how many users there are of privately printed labels. An estimate of the percentage of privately printed Certified Mail labels to the total number would be satisfactory. [k] Refer to your response to subpart o and confirm that mailers may use an address label on a return receipt card either for the sender's or the recipient's address or both. [l] What is the maximum thickness permitted for a post/stamped card? [m] What is the thickness of a return receipt card. [n] Confirm that address labels and certain other types of labels are authorized to be used on post/stamped cards. [o] Please again respond to how a removable label showing the Certified Mail article

number and affixed to a return receipt card [see DBP/USPS-124o] could create a machineability problem for handling a return receipt card. [p] The witness has made a statement that it would cost more to add a removable label on the USPS printed Certified Mail label for affixing to return receipt cards than the window time it takes to record that 20-digit number on the return receipt card and that's why the suggestion was not adopted. Yet, the witness is not able to justify either the cost data or the percentage of time spent by window clerks. Please reevaluate the responses to DBP/USPS-124 p and q and/or DBP/USPS-1 k and m.

DBP/USPS-192 Please refer to your responses to subpart b of DBP/USPS-131/132/133/134. [a] The use of the words "may process" rather than "processes" appears to indicate that the Postal Service handles return receipts in some other manner at other times at the referenced IRS center. Please clarify and explain the choice and significance of those words. [b] What percentage of the return receipts at each of the referenced IRS and state tax offices are handled in the manner similar to that referred to in the Inspection audit? [c] If the response to subpart b is less than 100%, please provide the approximate percentages and specific methods of processing the receipts.

DBP/USPS-193 Please refer to your responses to subparts c and d of DBP/USPS-131/132/133/134. Please indicate the specific line numbers of R97-1/USPS-RT-20 that provide the response to my specific questions in subparts c and d.

DBP/USPS-194 Please refer to your response to subpart b of DBP/USPS-97. Please describe any actions taken by Postal Service managers which would match the concept of "high-cost error correction" as noted in my interrogatory.

DBP/USPS-195 Please refer to your response to DFC/USPS-T30-57. [a] Are these 25 offices related to the offices that are referred to in your attachment to DFC/USPS-T30-12[a]? [b] If so, advise the numerical match between facilities numbers in each attachment. [c] If not, please advise the CAG level of each office in the DFC/USPS-T30-57 attachment. [d] Advise the specific days that each of Day 1 through 6 represent. [e] With respect to the number of PS3849 cards filed, do you have any concern with the validity of the data as

follows: Facility #3 always takes 5 minutes whether there are 27 to 46 cards; Facility #10 takes time to file no cards; Facility #17 filing time is always a multiple of 5 minutes; and facility #25 filing time is always 30 seconds per filing from 83 to 210 cards. Please respond with respect to each item noted. [f] Please confirm that there are a total of 6640 cards filed on all six days at all 25 facilities. [g] What is the average time per card filed that you utilized in your rate design and provide the specific calculations that were utilized to achieve that value. [h] What is the total volume of cards that are filed in all offices nationwide. An approximation with justification may be provided. [i] What is the calculated statistical mathematical level of confidence that this data represents when utilized to represent a measurement of the time required for filing the form nationwide. Show your calculations. [j] Explain why you are satisfied that this level of confidence is satisfactory. [k] With respect to the number of PS3849 cards retrieved, do you have any concern with the validity of the data as follows: Facility #4 took time on day 4 to evaluate no cards; Facility #17 always took a multiple of 5 minutes; Facility #24 always took a multiple of 15 minutes; 87% of all cards retrieved were completed at only four facilities. Please respond with respect to each. [l] Please confirm that there are a total of 148 cards retrieved on all six days at all 25 facilities. [m] What is the average time per card retrieved that you utilized in your rate design and provide the specific calculations that were utilized to achieve that value. [n] What is the total volume of cards that are retrieved in all offices nationwide. An approximation with justification may be provided. [o] What is the calculated statistical mathematical level of confidence that this data represents when utilized to represent a measurement of the time required for retrieving the form nationwide. Show your calculations. [p] Explain why you are satisfied that this level of confidence is satisfactory.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin      April 10, 2000



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