

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000]

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS 196-205]

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 22, 2000

Respectfully submitted,



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

DBP/USPS-196 Please refer to the response to DBP/USPS-62. [a] The response to subpart c did not indicate the number of articles delivered late. Please provide. [b] What is the total revenue received for all articles mailed in the March 27, 1999 to March 31, 2000 time frame utilized for your response to subparts a and c? [c] What is the total dollar amount of all refunds made during the March 27, 1999 to March 31, 2000 time frame? [d] Confirm that it would be appropriate to assume that the revenue received for the articles delivered by guaranteed time is reasonable close enough to 91.2% of the total revenue and that ratio of number of claims paid out compared to the number of articles delivered after the guarantee time is proportional to the corresponding revenue values. [e] If you are not able to confirm, provide your best estimate. [f] Confirm that your response to subpart f should also include those instances where the sender is not aware of the fact that the article was

delivered after the guaranteed time as well as instances where the sender is not aware of the ability to obtain a refund or does not believe that it is worth making the effort to obtain a refund.

DBP/USPS-197 Please refer to the response to DBP/USPS-80[f] which refers to the response to DFC/USPS-79 and 80. These interrogatories relate to the extent to which the Postal Service guarantees the delivery of Express Mail in instances where it is not possible to achieve delivery by that guaranteed time. In order to evaluate the extent to which this exists, response to my original interrogatories DBP/USPS-29 through 36 is needed and desired. Even though the Postal Service has objected to these interrogatories and I have filed a Motion to Compel, they may now be considered as a proper follow-up to the responses. As such, I again ask these eight interrogatories [DBP/USPS-29 through 36] as timely filed follow-up interrogatories.

DBP/USPS-198 Please refer to the response to DFC/USPS-79[c]. [a] Please elaborate on the types of exceptional transportation that might be instituted to achieve timely delivery of Express Mail. [b] Please provide copies of any written material which indicates the "Existing operations policies" that are referred to. [c] Please provide details of the approximate number of times that each of the types of referred to exceptional transportation was utilized in a recent period of time of one year or more and the approximate percentage of articles requiring such exceptional transportation to achieve delivery by the guaranteed time actually did receive it. [d] Please advise whether each of the following forms of achieving delivery by the guaranteed time would be considered to be the referred to exceptional transportation: [1] A city delivery carrier going several blocks out of the way to achieve timely delivery such as might be necessary to achieve delivery by the guaranteed 12 noon at an address that normally did not receive delivery until perhaps 2 PM. [2] Same as #1, except a rural or HCR carrier going many miles out of the way to achieve the same timely delivery. [3] Providing delivery to a city delivery address on a non-delivery day such as a Sunday, Holiday, or other non-delivery date. [4] Providing delivery to a rural or HCR address which utilizes an address in the format of 123 Main Street on a non-delivery day such as a Sunday, Holiday, or other non-delivery date. [5] Providing delivery to a rural or HCR address which utilizes an address in the format of RD 2 Box 123 on a non-delivery day

such as a Sunday, Holiday, or other non-delivery date. [6] Transportation of the mail to a postal facility on a day when mail is not normally transported to the facility. This includes all 365 days of the year. [7] Establish a means for delivering the article once the transportation referred to in #6 has been accomplished. [8] Opening a postal facility to allow for delivery of mail addressed to a Post Office Box on any of the 365 days of the year. [9] Same as #8 for mail addressed to General Delivery. [e] Please provide any other examples besides the nine items referred to in subpart d above. [f] To what extent will cost of providing this exceptional transportation enter into the decision to utilize the exceptional transportation to achieve delivery by the guaranteed delivery time? [g] Please provide copies of any directives which relate to the decision in subpart f above. [h] Confirm that there are places in Alaska having postal facilities where access may be achieved by air only. [i] Confirm that at locations noted in subpart h above some to all receive mail transportation less than seven days a week [j] Confirm that at locations noted in subpart h above some to all do not have scheduled air transportation seven days a week. [k] Confirm that at locations noted in subpart h would require a special unscheduled trip to achieve access all 365 days a year. [l] Provide some indication of the cost of making an unscheduled trip to a remote location in Alaska. [m] Provide an indication of the number of postal facilities in Alaska that have scheduled mail transportation to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [n] Provide an indication of the number of communities in Alaska having postal facilities that have scheduled air service to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [o] Provide an indication of the number of communities in Alaska to which unscheduled air service is available to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week. [p] Please explain the method by which the mail would be handled on either a scheduled or unscheduled air trip in Alaska [that was not a scheduled mail trip] with respect to the custody of the mail and the transfer of it to the Postal Service at the delivery point. [q] Are there existing agreements with air carriers to provide transportation of the mail on either a scheduled air trip [but not a normal mail trip] or on an unscheduled trip to an Alaska delivery point. [r] Please provide copies of such agreements. [s] What percentage of the Alaska points that are accessible by air only have such an

agreement? [t] Confirm that there are places in Alaska having postal facilities where access may be achieved by water only or in addition to air. [u] Please provide the data requested in subparts i through s for those facilities noted in subpart t above. [v] Please provide an indication of the extent to which weather and/or other factors in Alaska will prevent scheduled mail trips from taking place as planned.

DBP/USPS-199 Please refer to your response to DBP/USPS-62[f]. Please confirm that customers receiving an indication of a guaranteed delivery time could, in some to all instances, have an expectation that delivery would be accomplished by that time regardless of how isolated the destination might be.

DBP/USPS-200 Please refer to your response to DBP/USPS-80[e]. Please use your expertise to provide an approximation of the response to the original question.

DBP/USPS-201 Please refer to your response to DBP/USPS-137. The last sentence in subpart b seems to avoid the condition that even though the customer was not home when the mail was delivered to the residence, the customer does have access to their residence at any time as opposed to delivery to a post office box where the customer does not have access because the facility is closed. Please explain the original question.

DBP/USPS-202 Please refer to your response to DBP/USPS-138. Examination of this website indicates the following statement: "Did you know that U-PIC is now a strategic partner of the US Postal Service?" [a] Please provide details of this partnership. [b] Please provide a copy of any contract that exists. [c] Please explain how this company is able to provide insurance at 35 cents per \$100 if delivery confirmation is used and 40 cents per \$100 if delivery confirmation is not used when the Postal Service charges considerably more. [d] If this service is being promoted/utilized on Shipping on Line, a USPS service, why is it not promoted on other USPS services, such as retail single and volume users of insured mail?

DBP/USPS-203 Please refer to your response to DBP/USPS-139. [a] Please confirm that under the system that was previously in use, that the customer's signature will be

associated with a specific article and that the signature may not be transferred to a second or third article that was not actually delivered. [b] Please confirm that the example of Form 3849 provided allows for the entry of multiple article numbers. [c] What action is taken to ensure that an additional article number will not be inserted on the form after it has been signed? [d] What protection exists to ensure that it will not be possible for the Postal Service to associate a signature with an article number that was not actually delivered? [e] Confirm that it will be possible for a delivery employee to obtain "proof" that two articles were delivered when, in fact, only one article was turned over to the addressee and the second was "stolen". [f] Please confirm that the validity of the system depends on the ability of the postal employee to follow the proper procedures as well as the honesty of the postal employee. [g] Why is it planned to discard the signed delivery receipt after the transition period?

DBP/USPS-204 Please refer to your response to DBP/USPS-142. [a] The two versions that I have seen were both in English. Please reevaluate your response to subpart b. [b] Please provide me with hard copies of all survey forms.

DBP/USPS-205 Please refer to your response to DBP/USPS-143. [a] Please describe how the Postal Service plans to distinguish between the two similar 9-1/2 by 12-1/2 inch cardboard envelopes, one being a flat-rate envelope and the other not being one. [b] Do you feel that this will introduce a level of confusion to the mailer and/or to postal employees? [c] If not, why not?

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 22, 2000

