

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-165, 167, 170(A-B), 171-72, AND 178-79)

The United States Postal Service hereby provides the responses of witness Davis to the following interrogatories of David B. Popkin: DBP/USPS-165, 167, 170(a-b), 171-72, and 178-79, filed on April 12, 2000. Interrogatories DBP/USPS-157(a-c), 158(a, c, e-i, k), 159-161, 163-64, 169, 175, 177, 182(a), 183(a-d), 186(a-f, l), 187(a, d-f), 188, and 192-93 have been redirected to witness Mayo. Interrogatories DBP/USPS-157(d), 168, 173-74, 189, and 195 have been redirected to witness Davis. Interrogatory DBP/USPS-185 has been redirected to witness Kaner. Objections have been filed to interrogatories DBP/USPS-158(b, d, j), 162, 170(c-e), 176, 182(b-c), 183(e), 186(g-k), 187(b-c), 190, and 191. Responses to interrogatories DBP/USPS-166, 180, 181, 184, and 194 will be filed later.

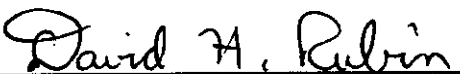
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 26, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE  
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**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 inquiry.

**RESPONSE:**

While some of this information is provided in response to DFC/USPS-T10-8(h), for simplicity here are new responses to the parts of interrogatory DBP/USPS-55.

- a) All mail processing facilities are now equipped with a device on a DBCS or CSBCS machine which will automatically "trap" a Certified Mail article by the presence of the phosphorous ink on the new Certified Mail label.
- b) See a) above.
- c) See a) above.
- d) Unless mail is processed in the manual operations or the older version of the Certified Mail label (no phosphorous ink) is used, which captures Certified Mail manually, then 100% of the mail run through a DBCS and CSBCS machine is subjected to the Certified Mail detector.
- e) Not applicable.
- f) See a) above.
- g) All facilities with DBCS and CSBCS machines are equipped with a Certified Mail detector.
- h) See g) above.

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**DBP/USPS-167**

Please refer to your response to DBP/USPS-67(c). Your response is confusing since you state that District Manager rather than 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?

**RESPONSE:**

The POM will be corrected. The DMM appears to be correct. No exceptions have been approved by the COO and EVP. The Postal Service has not surveyed District Managers to see how they administer these local decisions.

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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?

**RESPONSE:**

a. No.

b. We have been unable to identify a "requirement," per se, that mandates the operational practices described. Nonetheless, the Postal Service generally considers itself committed to conforming to those practices with some exceptions. One exception, which may or may not fall within the terms of the question because of the ambiguity of the phrase "placed into the system," would be instances in which the mail piece is "placed into the system" by deposit in a collection box after the last collection of the day. Other exceptions would relate to retail offices which are open for business after the last dispatch of the day to the processing facility. This might happen, for example, in an office that is open until 5 PM, when the last dispatch is made by a Star Route contractor who picks the mail up at 4 PM. Under those circumstances, there is no feasible way to have processed that day mail which is tendered at the window after 4 PM. The expectation would be, however, that the post office staff would inform mailers tendering mail after the dispatch of that situation.

c.-e. Objection filed.

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

**RESPONSE:**

There is nothing to provide. The question asked whether costs would change if something were to happen, when, in fact, as explained in the answer to 76c.-e., that something already happened twelve years ago. Because it has already happened, and because that status quo is already reflected in the current costs, there are no data relating to any hypothetical new change in costs to report.

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**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? [i] How are the costs paid for by the USPS accounted for in this rate

**RESPONSE:**

(a). Yes. The unique no-office point ZIP Codes (99695, 99696, 99790, 99850, and 99950) contain all the applicable no office points within the administrative offices of Anchorage, Kodiak, Fairbanks, Juneau and Ketchikan. If a no-office point in the 99850 area suddenly receives transportation only through Sitka, then that office would use a phantom post office box address through Sitka and be dropped from the 99850 ZIP Code file.

(b). The following no-office points are attached to 99950:

Bell ISLAND	PO BOX KBE	99950-0001
CAPE POLE	PO BOX CZP	99950-0010
DEEP BAY	PO BOX DPB	99950-0030
EDNA BAY	PO BOX EDB**	99950-0040

\*\* EDNA BAY has become a public service contract facility and now

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shares Ketchikan's 99901 ZIP Code. There are more offices attached to the Ketchikan no-office point ZIP Code, this listing was shown to clarify the question about how many offices would use the unique ZIP Code.

(c). Providing a listing of each post office and its associated no-office point is attached. We do not tract no-office points beyond the current ZIP Code as it does not affect mail transportation. Since no-office point names do not show up in our products, we do not have a cross reference listing. We made the attached local facility listing to list those points separately. We have not edited the list recently. Several NOPs closed in the Kodiak area due to the airline carrier removing service to many of the sites.

(d). To my knowledge, the No-office point concept is not used anywhere else except Alaska. In my initial response, I stated that the concept originated through the Essential Air Service provisions set forth to ensure small Alaskan communities received some type of transportation.

(e). There is no fee group for the post office box address used by the No-office point community. The post box address everyone in the community uses is a phantom number established solely to permit the sortation of the community's mail from the administrative post office who would use the same ZIP Code, or to allow the administrative office to determine which community to dispatch the mail when that administrative office processed mail for more than one no office point community. There are no postal services within a no-office point, hence, there can be no post office box rents. Under the current post office box regulations, these customers would be eligible for Group E rates in their administrative post offices if they chose to use a post office box for their mail.

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(f). No physical box is used for the no office point community. This is only a second line address established to meet the requirements of Postal Addressing Standards and to provide the community a standardized mailing address.

(g). The Postal Service's responsibility ends when the airline carrier drops the mail at the no-office point drop location or to the authorized agent for the community.

(h). The Postal Service pays for the mail transportation to and from the no-office point. The customer only pays for postage like any customer.

(i). I think Postal Service Transportation experts in Washington DC would be able to address this question more accurately. In my opinion, the costs associated with transporting mail in Alaska have been tied back to the essential services requirements. Under that arrangement, no-office point service is legitimate transportation expense and lumped in with all the transportation costs for during business in Alaska.



nop

ALEXANDER CREEK (NOP)	P O BOX ACR	ANCHORAGE	AK	99695-0020
IVANOF BAY (NOP)	P O BOX KIB	ANCHORAGE	AK	99695-0050
BELUGA (NOP)	P O BOX BLG	ANCHORAGE	AK	99695-0100
PORT MOLLER (NOP)	P O BOX PML	COLD BAY	AK	99571-8999
FALLS BAY (NOP)	P O BOX FLJ	CORDOVA	AK	99574-8994
PORT SAN JUAN (NOP)	P O BOX PJS	CORDOVA	AK	99574-8995
ICY BAY (NOP)	P O BOX ICY	CORDOVA	AK	99574-8996
ELLAMAR (NOP)	P O BOX EMA	CORDOVA	AK	99574-8997
CAPE YAKATAGA (NOP)	P O BOX CYT	CORDOVA	AK	99574-8998
BOSWELL BAY (NOP)	P O BOX BES	CORDOVA	AK	99574-8999
PORTAGE CREEK (NOP)	P O BOX PCA	DILLINGHAM	AK	99576-8998
EKUK (NOP)	P O BOX KKU	DILLINGHAM	AK	99576-8999
GULKANA (NOP)	P O BOX GKN	GAKONA	AK	99586-8999
MCCARTHY (NOP)	P O BOX MXY	GLENNALLEN	AK	99588-8998
MAY CREEK (NOP)	P O BOX MYK	GLENNALLEN	AK	99588-8999
RED MOUNTAIN (NOP)	P O BOX RDO	HOMER	AK	99603-8999
POPE VANNOY LANDING (NOP)	P O BOX PVY	ILIAMNA	AK	99606-8999
UGASHIK (NOP)	P O BOX UGA	KING SALMON	AK	99613-8998
ALENEVA (NOP)	PO BOX AED	KODIAK	AK	99697-0010
KITOI BAY (NOP)	P O BOX KKB	KODIAK	AK	99697-0020
MOSER BAY (NOP)	P O BOX KMY	KODIAK	AK	99697-0040
<del>OLGA BAY (NOP)</del>	<del>P O BOX KOY</del>	<del>KODIAK</del>	<del>AK</del>	<del>99697-0050</del>
PORT BAILEY (NOP)	P O BOX KPY	KODIAK	AK	99697-0060
PORT WILLIAMS (NOP)	P O BOX KPR	KODIAK	AK	99697-0090
TERROR BAY (NOP)	P O BOX KTY	KODIAK	AK	99697-0130
UGANIK BAY (NOP)	P O BOX UGI	KODIAK	AK	99697-0140
<del>UYAK (NOP)</del>	<del>P O BOX KUY</del>	<del>KODIAK</del>	<del>AK</del>	<del>99697-0150</del>
WEST POINT (NOP)	P O BOX KWP	KODIAK	AK	99697-0170
ZACHAR BAY (NOP)	P O BOX KZB	KODIAK	AK	99697-0200
ALITAK (NOP)	P O BOX ALZ	KODIAK	AK	99697-0210
AMOOK (NOP)	P O BOX AOS	KODIAK	AK	99697-0220
SEAL BAY (NOP)	P O BOX SYB	KODIAK	AK	99697-0230
HEALY LAKE (NOP)	PO BOX 60300	FAIRBANKS	AK	99706-0300
BIRCH CREEK (NOP)	P O BOX KBC	FT YUKON	AK	99740-8999
CANDLE (NOP)	PO BOX CDL	KOTZEBUE	AK	99752-8999
SOLOMON (NOP)	P O BOX SOL	NOME	AK	99762-8997
PORT CLARENCE (NOP)	P O BOX KPC	NOME	AK	99762-8998
TIN CITY (NOP)	P O BOX TNC	NOME	AK	99762-9999
BOUNDARY (NOP)	P O BOX BYA	TOK	AK	99780-8998
CHISANA (NOP)	P O BOX CZN	TOK	AK	99780-8999
WISEMAN (NOP)	HC 65 BOX 9801	FAIRBANKS	AK	99790-9801
FALSE ISLAND (NOP)	P O BOX FAK	SITKA	AK	99835-8996
EXCURSION INLET (NOP)	P O BOX EXI	JUNEAU	AK	99850-0090
FUNTER BAY (NOP)	P O BOX FNR	JUNEAU	AK	99850-0140
HOBART BAY (NOP)	P O BOX HBH	JUNEAU	AK	99850-0190
FRESHWATER BAY (NOP)	P O BOX FRP	JUNEAU	AK	99850-0350
CUBE COVE (NOP)	P O BOX CVW	JUNEAU	AK	99850-0360
BELL ISLAND (NOP)	P O BOX KBE	KETCHIKAN	AK	99950-0001
CAPE POLE (NOP)	P O BOX CZP	KETCHIKAN	AK	99950-0010
DEEP BAY (NOP)	P O BOX DPB	KETCHIKAN	AK	99950-0030
EDNA BAY	P O BOX EDB	EDNA BAY	AK	99950-0040
HOLLIS (NOP)	PO BOX HYL	KETCHIKAN	AK	99950-0070

LORING (NOP)	P O BOX LRG	KETCHIKAN	AK	99950-0090
NEETS BAY (NOP)	P O BOX FIC	KETCHIKAN	AK	99950-0160
PORT ALICE (NOP)	P O BOX PTC	KETCHIKAN	AK	99950-0170
PORT PROTECTION (NOP)	P O BOX PPV	KETCHIKAN	AK	99950-0180
TOKEEN (NOP)	P O BOX TKI	KETCHIKAN	AK	99950-0230
VIEW COVE (NOP)	P O BOX LIJ	KETCHIKAN	AK	99950-0250
WATER FALL (NOP)	P O BOX KWF	KETCHIKAN	AK	99950-0270
WHALE PASS (NOP)	P O BOX WWP	KETCHIKAN	AK	99950-0280
FIRE COVE (NOP)	P O BOX FIC	KETCHIKAN	AK	99950-0290
LAB BAY (NOP)	P O BOX WLB	KETCHIKAN	AK	99950-0310
YES BAY (NOP)	P O BOX WYC	KETCHIKAN	AK	99950-0320
HAPPY HARBOR (NOP)	P O BOX KXA	KETCHIKAN	AK	99950-0330
KASAAN CONTRACT BRANCH	P O BOX KXA	KASAAN	AK	99950-0340
LONG ISLAND (NOP)	P O BOX LIJ	KETCHIKAN	AK	99950-0350
POLK INLET (NOP)	P O BOX POQ	KETCHIKAN	AK	99950-0370
NAUKATI BAY (NOP)	P O BOX NKI	KETCHIKAN	AK	99950-0550

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**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 [sic]? [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.

**RESPONSE:**

- a. No additional information is available. A safe bet would be that the percentages of lobbies and post office boxes available 24 hours per day is more than none and less than all, with a best guess that the number is below 50 percent.
- b. The word "should" speaks for itself and does not mean "mandatory."
- c. No guidelines regarding the definition of "should" have been issued. See also the response to DBP/USPS-84(b).
- d. Yes.
- e. This question is unclear. Many small offices are manned by only one employee, who do what they can to provide service to customers. Post office boxes, a service window, and any mailhandling area may be located within a (partitioned) single room, even if rest room facilities are not. See also the response to DBP/USPS-84(b).
- f-g. Not that we have been able to identify.

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**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]?

**RESPONSE:**

This question is already answered by the response to DBP/USPS-92. To the extent some other question was intended to be posed, *see gen'ly*, DMM § D910.

## 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  
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April 26, 2000