

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,
AS REQUIRED BY PRESIDING OFFICER'S RULING NO. R2000-1/59
(DBP/USPS—129, 131(A), 132(A), 133(A), AND 134(A))

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBP/USPS—129, 131(a), 132(a), 133(a), and 134(a), as compelled by Presiding Officer's Ruling No. R2000-1/59, issued May 10, 2000. A status report on the compelled response to interrogatory DBP/USPS-130 was provided on May 15, 2000.

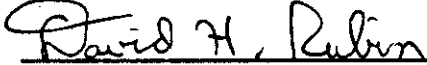
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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May 17, 2000

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

DBP/USPS- 129 Refer to the response to DBP/USPS-3. [a] Provide details on the extent to which your yes response to subpart d applies. Is it nationwide? [b] Regarding the response to subpart e, provide a listing of each of the previous editions of this form and whether or not there is tagging. [c] Will the tagging on previous versions of Form 3800 also act in the same manner as the July 1999 version? [d] Regarding the response to subpart f, explain why the word "most" was used before BCSs and "if so designated" was used at the end of the sentence. Explain and describe the extent to which this sorting takes place. [e] Regarding the response to subpart g, is the second and third sentence the only example that you are not able to provide an unconditional confirmation? If not, please provide other examples. [f] Please provide a copy of USPS Form 3812 referred to in your response.

Response:

- a. An effort is made nationwide to remove Certified Mail articles from an automated system to a manual system.
- b. The April, 1995 version of Form 3800, which was the version in use before the July, 1999 version, also had tagging.
- c. Yes.
- d. For clarification of the use of the word "most" before BCSs in subpart (f) of DBP/USPS-3, see DFC/USPS-T10-8(h); the wording "if so designated" was used to convey the fact that not all sort plans designate a dedicated bin for Certified Mail articles. If the sort plan designates a dedicated bin for Certified Mail articles, and the Certified Mail detector is on, then the Certified Mail articles are sorted to the dedicated bin. If the sort plan does not designate a dedicated bin, then the Certified Mail articles are manually removed.
- e. Yes.

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- f. PS Form 3812 was erroneously written in the response to DBP/USPS-3(g), which should refer to PS Form 3849. A copy of PS Form 3849 is attached to witness Mayo's response to DBP/USPS-139 (Tr. 14/5461).

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

DBP/USPS-131. Attached to this pleading is a letter dated September 24, 1999, as Attachment A. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service.

RESPONSE:

- a. The letter attached to the interrogatory (Tr. 14/5450) accurately describes the current procedures used to process return receipt mail under the circumstances represented in the letter.

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

DBP/USPS-132. Attached to this pleading is a letter dated September 24, 1999, as Attachment B. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service.

RESPONSE:

- a. The letter attached to the interrogatory (Tr. 14/5452) accurately describes the current procedures used to process return receipt mail under the circumstances represented in the letter.

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

DBP/USPS-133. Attached to this pleading is a letter dated October 26, 1999, as Attachment C. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service.

RESPONSE:

- a. The letter attached to the interrogatory (Tr. 14/5454) accurately describes the current procedures used to process return receipt mail under the circumstances represented in the letter.

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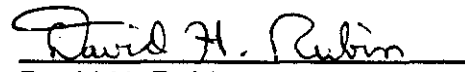
DBP/USPS-134. Attached to this pleading is a letter dated September 28, 1999, as Attachment D. [a] Please verify that this letter was prepared and sent to me by an employee of the United States Postal Service.

RESPONSE:

- a. The letter attached to the interrogatory (Tr. 14/5456) accurately describes the current procedures used to process return receipt mail under the circumstances represented in the letter.

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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Washington, DC 20260-1137
May 17, 2000