

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

COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-28-36)

The United States Postal Service hereby provides its compelled responses to the following interrogatories of David B. Popkin: DBP/USPS-28-36, pursuant to Presiding Officer's Ruling No. R2000-1.


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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 18, 2000

**COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-28.** The reverse side of the Customer Copy of the Express Mail receipt Label 11-B provides the conditions for refunding the postage for those instances where overnight delivery is scheduled and is not accomplished.

[a] Does this also apply to Second Day Express Mail where delivery is not accomplished by the second day after mailing? If so, why doesn't the receipt indicate so?

[b] The back of the receipt indicates that refunds will not be made when detention was made for a law enforcement purpose. What types of activities would fit into that category? What section of the DMM authorizes that additional condition?

**Response:**

a) See DMM section D500.1.3

b) See DMM Section S500.2.1, citing Administrative Support Manual 274.

COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-29.** May Express Mail [Next Day and Second Day Service] be mailed at all postal facilities within all of the ZIP Codes listed on pages 11-34 through 1 I-36 of the 1999 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military - main offices, stations, branches, rural carriers, and other points at which other classes of mail may be tendered - during their normal office hours? If not, provide any exceptions either by category or by specific office[s].

**Response:**

See DMM section D500.2.

COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-30.** May Express Mail [Next Day and Second Day Service] be addressed to all valid addresses within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 1999 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military? If not, provide any exceptions either by category or by specific office[s].

**Response:**

See the following DMM sections:

E500.4.1

E500.5.1

E500.5.2

E500.6.3

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**DBP/USPS-31.**

[a] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-29 have a listing of those 3-digit ZIP Code prefixes for which Next Day delivery will be achieved.

[b] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-29 have a cutoff time, established by the Postmaster by which Express Mail must be presented to achieve Next Day delivery.

[c] Must there be a reasonable minimum amount of time from the opening of the retail window service to the cutoff time to allow for mailers to deposit Express Mail on that day in order to achieve Next Day delivery? If not, why not?

[d] If a facility has an cutoff time as noted in DMM E500.5.3 for Next Day service that is after 5 PM, must the time noted in DMM E500.6.2 for Second Day service be equal to or later, but not earlier than, the Next Day cutoff time? If not, why not?

[e] Confirm, or discuss and explain if you are unable to do so, that an Express Mail article may be mailed at any facility noted in response to DBP/USPS-29 at any time that there are retail window service hours.

**Response:**

To the extent these matters are covered in the DMM, please see section D500.2.0.

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**DBP/USPS-32.**

[a] With respect to whether or not the Next Day Service will be achieved by 12 Noon or 3 PM, is this a function of the dispatching office, the delivery office, or both?

[b] What criteria are utilized to make this determination?

[c] Does it apply all days of the year? If not, what are the exceptions?

[d] Does the same time of the day apply equally to Next Day and Second Day service? If not, please explain.

**Response:**

There are no applicable DMM citations.

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**DBP/USPS-33.** For this interrogatory, the following assumptions apply:

1. The article will be deposited at a facility as noted in the response to DBP/USPS-29.
2. The article will be addressed to an address noted in the response to DBP/USPS-30.
3. The window hours for this post office are 8 AM to 6 PM.
4. The cutoff time for Express Mail Next Day Delivery service is 2 PM.
5. The list refers to those 3-digit ZIP Codes that are designated for overnight service.
6. The time of 10 AM was chosen to represent a time both before the 2 PM cutoff time and before 5 PM as noted in DMM Section E500.6.2 and can be as early as 12:01 AM; the time of 3 PM was chosen to be after the 2 PM cutoff time but before the 5 PM as noted in DMM E500.6.2 and before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight; the time of 5:30 PM was chosen to be after the 5 PM as noted in DMM E500.6.2 and after the 2 PM cutoff time but before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight,

[If the choice of time is significant, please explain in your response]

7. All articles are mailed on Day 0 which for convenience will be noted as Monday [if the choice of day is significant, please explain in your response] Please confirm, or explain and discuss if you are unable to confirm, that articles mailed as noted will receive a refund if they are not delivered by the time shown [other than for the exceptions shown in DMM E500.5.3 and 6.21:

[a] Mailed Monday at 10 AM destined for an office on the list - will be delivered by 12 Noon or 3 PM Tuesday.

[b] Mailed Monday at 3 PM destined for an office on the list -will be delivered by 12 Noon or 3 PM Wednesday.

[c] Mailed Monday at 5:30 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[d] Mailed Monday at 10 AM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.

[e] Mailed Monday at 3 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM. Wednesday.

[f] Mailed Monday at 5:30 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Thursday.

**Response:**

See DMM sections P014.5.0 and S500.2.0 regarding refunds of postage.

COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-34.**

[a] Confirm, or explain if you are unable to do so, that Express Mail will be delivered all 365/6 days a year.

[b] Confirm, or explain if you are unable to do so, that Express Mail may be addressed to any authorized type of address, including, but not limited to, city delivery street address, post office box, General Delivery, Rural Route / HCR Route in the RR 2 Box 123 format, and Rural Route | HCR Route in the city delivery type format [123 Main St].

**Response:**

- a) There are no applicable DMM citations.
- b) See DMM section 500.



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**DBP/USPS-35.**

[a] Confirm, or explain if you are unable to do so, that for Express Mail articles other than those addressed to a Post Office Box or General Delivery, an actual physical attempt at the addressee's location must be made prior to the guaranteed time or it will be considered a failure [and thus a refund of postage may be obtained] unless it meets one of the two exemptions in DMM Section E500.5.3/6.2 a and b.

[b] Confirm, or explain if you are unable to do so, that Express Mail which is addressed to a Post Office Box or General Delivery will constitute a failure if the addressee does not have access to the post office box and/or the ability to claim the article such as might occur if the box section was closed or the notice of arrival was placed in the box but it was not possible for the addressee to claim the mail.

[c] Confirm, or explain if you are unable to do so, that contacting an addressee by telephone or by requiring an addressee to pick up their Express Mail at a facility would constitute a failure [other than PO to PO service].

[d] May Post Office to Post Office Service be sent to all post offices in the areas as noted in response to DBP/USPS-30? If not, provide a listing of all offices to which it may be sent.

[e] Confirm, or explain if you are unable to do so, that the guaranteed delivery times for both PO to Addressee and PO to PO will be the same areas - both overnight and second day.

[f] Clarify DMM Section E500.6.4 - if a PO-PO Express Mail article is sent to a second day area on a Saturday, will delivery be guaranteed on Monday or Tuesday [assume the delivery office is closed on Sunday and 12.open the other six days of the week - is delivery made on the second business day after mailing - Tuesday in this case - or is it delivered on the first business day which is on or after the second day - Monday in this case]?

**Response:**

a-f) Service failures can be ascertained by comparing the recorded information on Express Mail Label B-11 in the boxes for "Day of Delivery" and "Delivery Attempt" and/or "Delivery Date".

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**DBP/USPS-36.** With respect to the delivery of Express Mail, do regulations or Headquarters directives mandate each of the following and/or discuss its applicability [please provide copies of the directives and/or citation of the regulation]:

[a] Should delivery be made as early as convenient or is anytime prior to the guaranteed delivery time satisfactory?

[b] Should city delivery carriers deviate from their routes to achieve delivery prior to the guaranteed delivery time?

[c] Should rural/HCR carriers deviate from their routes to achieve delivery prior to the guaranteed time?

**Response:**

There are no applicable citations.

## 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.



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May 18, 2000