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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORIES OCA/USPS-1(f.-h.), 2, 11, AND 14  
(June 12, 2001)

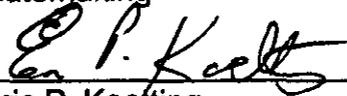
OCA interrogatories 1 - 14 were filed on May 22, 2001. The Postal Service requested an extension of time to object or respond, and an extension of time to file objections was granted until June 8, 2001, and to respond until June 12, 2001. On June 8, the Postal Service objected to parts a-e and i of question 1, and all of questions 3-10 and 12-13. The Postal Service hereby responds to OCA/USPS 1(f.-h.), 2, 11, and 14. Each question is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 12, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OCA**

OCA/USPS-1. The following interrogatories refer to the mail pickup times listed on USPS mail collection boxes. Also, please refer to POM 8, section 313.1 and 313.2

- (a) Do sections 313.1 and 313.2 reflect the Postal Service's policy regarding mail pickup times? If not, please provide a copy of the publication that states the Postal Service's actual policy.
- (b) Section 313.1 indicates that collections be made "as near as possible to the posted pickup time, but not before posted times for specific trips."
  - (1) For each of the past five years, is the Postal Service aware of any mail being picked up prior to posted times? Please identify all documents examined in preparing this response.
  - (2) If your response to part '(b)(1)' of this interrogatory is affirmative, please indicate when and under what circumstances mail was picked up prior to the times posted on collection boxes?
- (c) For FY 2000, what volume of mail was picked up earlier than the posted collection times? For each instance of an early pickup time, please provide the volume of collection mail picked up on the following day.
- (d) POM 8 section 313.2 indicates that "motorized collections ... should be made no later than 20 minutes after the posted time." What is the Postal Service's current policy regarding mail pick-ups occurring after the time(s) posted on collection boxes? Please provide a copy of the publication that states the Postal Service's actual policy.
- (e) Please describe the impact upon further mail processing when collection mail is picked up later than the designated time posted on the box.
- (f) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream via mail collection boxes.
- (g) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream on Sundays via mail collection boxes.
- (h) For each of the past five years and delineated by holiday, please provide: (1) an estimate of the quantity of mail entered into the U.S. postal mail stream on the designated holiday via collection boxes, and (2) the volume of mail entered into the U.S. postal mail stream via collection boxes on the day following the specified holiday.
- (i) For each of the past five years, please provide all information available on the frequency and accuracy of collection box pickup times. Also, include in the data provided the volume of mail per collection box per pickup. If the information is available in electronic format, provide the data as an ASCII formatted file with a description of the data to include but not limited to field descriptions, field length and field format.

**RESPONSE:**

a.-e. Objection filed.

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- f. The Postal Service has no identified need for this information, and therefore no estimates exist to provide.
- g. Since the Postal Service does not routinely sweep collection boxes on Sunday, typically no mail enters the mail stream on Sundays via collection boxes. If the question is intended to solicit an aggregate estimate of how much mail collected on Mondays is actually deposited in the collection boxes on Sunday, the Postal Service has no identified need for such an estimate, and is unaware of any practical means to develop such an estimate.
- h. The Postal Service has no identified need for this information, and therefore no estimates exist to provide. It may be noted, however, that if a collection box is not swept on a holiday, which may be the case, then there is no practical means when the box is swept on the following day to distinguish the mail that was deposited on the holiday from mail that was not deposited until later.
- i. Objection filed.

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OCA/USPS-2. The following is quoted from section 313.5 of POM Issue 8, July 16, 1998 updated through May 4, 2000. "When a holiday falls on a Monday, a collection must be made from all collection boxes on either Sunday or the Monday holiday."

- (a) Does the Postal Service pick up mail on either Sunday or the Monday holiday when the holiday falls on a Monday?
- (b) When a holiday falls on a Monday, how is the general public informed of the Sunday or Monday holiday collection time?
- (c) Who determines when the box collections will be made?
- (d) If your response to part (a) of this interrogatory is other than affirmative, please explain why section 313.5 of POM Issue 8 has not been revised to reflect the Postal Service's actual practice.

**RESPONSE:**

- a. Not necessarily.
- b. Assuming that mail in the box is collected on the holiday, the public probably would not be informed, because the holiday collection field on the label is quite likely to be blank.
- c. Local offices make this determination.
- d. The POM will be revised to reflect actual practice.

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OCA/USPS-11. When a holiday eve falls on a day other than Sunday, does the USPS have a *national* policy regarding mail pick-up and mail processing for the holiday-eve service (for example, December 24 and December 31)? If so, please provide a copy of the current policy.

**RESPONSE:**

No. See the response to DFC/USPS-16.

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OCA/USPS-14. The following interrogatory refers to two documents. The first document is Exhibit 1, page 2 of the document entitled Douglas F. Carlson Complaint on Sunday and Holiday Collections, Docket No. C2001-1, dated October 23, 2000, docketed October 27, 2000. Exhibit 1, page 2 is the Postal Service's response to DFC/USPS-3. The Postal Service states in its response, "The Postal Service policy is not to conduct Sunday collections or outgoing processing of First-Class Mail except during the holiday season or as a contingency for unusual circumstances." The second document is POM Issue 8, July 16, 1998, updated with Postal Bulletin revision through May 4, 2000, section 322.233. "Sunday and holiday pickups should be at least once a day, as late as possible to ensure that the mail will connect with dispatches of value to meet established standards."

- (a) Please explain why POM section 322.233 has not been updated to reflect the apparent discrepancy in Sunday and holiday collections with the Postal Service's practice as reflected in the Postal Service's response to DFC/USPS-3?
- (b) As defined in section 322.233 of POM Issue 8, please define the term "dispatches of value."

**RESPONSE:**

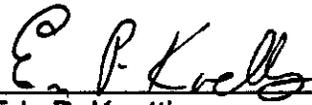
- a. The POM will be revised to reflect actual practice.
- b. A "dispatch of value" is any dispatch early enough to allow mail to reach the mail processing center in time to receive all necessary processing in accordance with the applicable operating plan.

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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