

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

RECEIVED
JUN 14 4 05 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-1 (a., c., & e.), 4-7
(June 14, 2001)

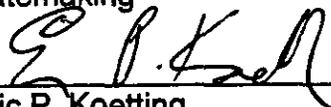
DBP/USPS-1 - 12 were filed on May 31, 2001. On June 12, the Postal Service filed objections to questions 1-12, but also indicated that, without waiving its objections, it would provide answers to parts a., c., and e. of question 1, and to questions 4-7. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking


Eric P. Koetting
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992/ FAX: -5402
June 14, 2001

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

DBP/USPS-1[a] Confirm that Exhibit 125.22 of the Postal Operations Manual [POM] - Issue 8 dated July 18, 1998 and Exhibit 1.5 of Section G011.1.5 of the Domestic Mail Manual [DMM] - Issue 56 dated January 7, 2001 are both utilized to provide Holiday Service Levels to members of the public as well as postal employees. [b] Confirm that the Definition of Terms for Holiday and Sunday contained in the DMM Exhibit also apply to the POM Exhibit. [c] Confirm that the approving authority for exceptions to the service levels differs between the POM and DMM Exhibits. [d] Provide any other differences that exist between the POM and DMM Exhibits and advise which Exhibit is correct. [e] Please explain and discuss any items that you are not able to confirm.

RESPONSE:

- a. Not confirmed that the POM is necessarily utilized to provide information about holiday service to members of the public.
- b. Objection filed.
- c. Confirmed.
- d. Objection filed.
- e. See above.

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

DBP/USPS-4. Based on the discrepancy between the POM and DMM Exhibits, please advise the current Postal Service policy as to the level of approval that is required to approve any exceptions to the holiday service levels.

RESPONSE:

As shown by a variety of materials already provided in this proceeding, the current practice with regard to collection and outgoing mail processing on holidays is to issue a memorandum to the field for each holiday providing guidance on those operations for that holiday.

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

DBP/USPS-5. With the exception of the discrepancy noted in DBP/USPS-4, provide any other data contained in these Exhibits that does not represent current Postal Service policy and advise the level of service mandated by the current policy.

RESPONSE:

Please see the responses to DBP/USPS-4 with respect to holiday collection and mail processing.

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

DBP/USPS-6. Does the Postal Service plan to change these Exhibits to match current Postal Service policy? If so, please advise when it will be accomplished by. If not, please explain why not.

RESPONSE:

As indicated in earlier pleadings in this proceeding, the Postal Service intends to revise several portions of the POM relating to Sunday and holiday service. It is unclear when that process will be completed, as the relevant staff resources are currently occupied with other responsibilities, including participation in this proceeding.

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

DBP/USPS-7. Please advise the publicity provided to the mailing public to advise them of any exceptions to the holiday service levels as noted in responses to DBP/USPS 2 and 3.

RESPONSE:

It is unclear what publicity may have been provided in connection with exceptions to holiday collection service over the years. (It is, perhaps, even more unclear what portion of the mailing public has even a vague awareness of, much less any significant interest in, the holiday collection information currently presented in the DMM.) In general, there is greater concern with respect to publicity if collection service is expected to conflict with the collection times posted on collection boxes. That is why the Postal Service instructs the field to leave the holiday collection field blank on collection box schedules unless mail in the box is expected to be picked up and processed on every holiday, and to use available media to publicize in advance instances in which collection pickups are expected to vary from posted collection schedules. See the responses to DFC/USPS-3 and 17. There is, of course, a great deal of publicity alerting the public that post offices are closed on federal holidays, and that message may be the only one likely to register with the vast majority of the general public.

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:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

David B. Popkin
P.O. Box 528
Englewood NJ 07631-0528



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992/ FAX: -5402
June 14, 2001