

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Oct 1 11 42 AM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO SUSAN W. MAYO (OCA/USPS-T35-1-7)
October 1, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,


SHELLEY S. DREIFUSS
Acting Director
Office of the Consumer Advocate

KENNETH E. RICHARDSON
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T35-1. In its Opinion in Docket No. R2000-1, the Commission said the Postal Service is not properly informing consumers about the limitations in its Express Mail delivery network (Opinion at 221) and suggested the Postal Service review its overall advertising and consumer information so that customers are made aware of potential limitations of the service; that is, so that they are notified that either the delivery standards cannot be met or revise the delivery standards so that they are more realistic.

- (a) Please explain the steps taken by the Postal Service since the Commission's Opinion to review the Postal Service's overall advertising and consumer information for Express Mail to make consumers aware of the potential limitations in the service's ability to meet the delivery standards for Express Mail.
- (b) Please indicate what specific steps the Postal Service has taken to make consumers aware of the potential limitations of the service's ability to meet the delivery standards for Express Mail.
- (c) Are there ZIP Code pair delivery standards for Express Mail for each ZIP Code to which Express Mail is delivered? If so, is each of those standards available to the consumer for each ZIP Code pair and how does the consumer access those standards for any particular ZIP Code pair?
- (d) Since the Commission's Opinion in Docket No. R2000-1, has the Postal Service adjusted downward any ZIP Code pair delivery standards for Express Mail because the prior service standard could not be met? If so, please provide a listing of those pairs for Express Mail which were changed and the proportion that the changed pairs are to the total number of all Express Mail ZIP Code pairs.

OCA/USPS-T35-2. The Commission Opinion in Docket No. R2000-1 noted its concern about the high on-time failure rate of 8.8 percent for Express Mail which, it said, is inconsistent with guaranteed service and that because the service is not really "premium" the intrinsic value of service justifies only a markup index near the systemwide average (Opinion at 221)

- (a) Please provide the on-time failure rate for Express Mail for each period since the 8.8 percent period cited by the Commission in the Opinion.
- (b) Please indicate what steps the Postal Service is taking to improve the on-time failure rate for Express Mail during the period that the rates proposed in this case will be in effect.

OCA/USPS-T35-3. The following questions refer to the proposed classification change in the service guarantee for Express Mail postage refunds.

- (a) For each year, FY 2000 and FY 2001, please provide by Express Mail weight increment and service type, the number of refunds requested. Also, for each refund requested, please provide: (1) the amount of additional insurance purchased; (2) the amount of the refund requested; (3) indicate whether or not the claim has been paid; (4) if the claim was denied, please provide the reason that the claim was denied; (5) if the claim was paid, indicate the amount paid; (6) provide the time elapsed from the claim's filing date to the claim's settlement date; and (7) the mail piece's destination ZIP Code. Provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket. In

preparing your response, please provide the information in a file format that may be imported into an EXCEL spreadsheet.

- (b) For each year, FY 2000 and FY 2001, please provide by Express Mail weight increment, the total dollar value, the total number of claims filed, and the value of any subsequent refunds paid for service delays due to each of the following reasons: (1) detention for law enforcement purposes; (2) strike or work stoppage; (3) late deposit of shipment, forwarding, return, incorrect address, or incorrect ZIP Code; (4) delay or cancellation of flights; (5) war, insurrection, or civil disturbance; (6) a breakdown in the transportation network; and (7) acts of God. Provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket. In preparing your response, please provide the information in a file format that may be imported into an EXCEL spreadsheet.

OCA/USPS-T35-4. In September 2001, the Postal Service's Answer Unit (800-725-2161) Customer Service Representative indicated in response to a telephone inquiry that the Postal Service employee responsible for determining whether to pay an Express Mail postage refund claim is the local window clerk.

- (a) For any given Express Mail postage refund claim, is the USPS local window clerk responsible for determining whether an Express Mail postage refund claim should be paid?
- (b) If your response to part (a) of this interrogatory is affirmative, please provide copies of all training materials and information available and used by window

clerks in determining the conditions under which the USPS will honor an Express Mail postage refund claim.

- (c) If your response to part (a) of this interrogatory is other than affirmative, please indicate who is responsible for determining when to pay an Express Mail postage refund claim and provide copies of all training materials and information used by the individual when determining the conditions under which the USPS will honor an Express Mail postage refund.
- (d) What current means are available to postal patrons who wish to appeal a local clerk's decision to deny a postage refund payment for an overdue Express Mail item? Please provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket.
- (e) For each year, FY 2000 and FY 2001, how many Express Mail postage refund claims were denied and what was the total dollar value of those claims? (For FY 2001, please provide the most current data available.) Provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket.
- (f) For each year, FY 2000 and FY 2001, how many Express Mail postage refund claims that were initially denied by window clerks were subsequently paid and what is the total dollar value of those claims? Provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket.

- (g) Does the Postal Service evaluate or otherwise track whether Express Mail postage refund claims are processed and paid by the window clerks on a consistent nationwide basis? If so, please provide copies of all documentation available as to how the consistency is evaluated. In your response, please include a summary of the Express Mail postage refund evaluations by postal region for FY 2000 and FY 2001.
- (h) If your response to part (g) of this interrogatory is other than affirmative, please explain why evaluations on the consistency of treatment for Express Mail postage refund claims are not performed.
- (i) For each year, FY 2000 and FY 2001, please provide the total budgeted amount as well as the actual payments made for Express Mail postage refunds resulting from the failure of the Postal Service to meet its stated standards. Please provide specific cites to all source documents referenced and include a copy of each reference used if one has not been previously filed in this docket.
- (j) For FY 2000 and FY 2001, please provide a copy, by Express Mail service offering and by postal designated region, the (1) the USPS service standards, paired with (2) the actual service standards achieved. Provide specific cites to all source documents used in preparing your response and include a copy of the source documents if one has not been previously filed in this docket.

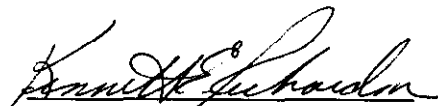
OCA/USPS-T35-5. The USPS proposed DMCS language provides for discretionary authority to deny refunds when an Express Mail delay is caused by: (a) detention for law enforcement purposes; (b) strike or work stoppage; (c) late deposit of shipment, forwarding, return, incorrect address, or incorrect ZIP Code; (d) delay or cancellation of

flights; (e) governmental action beyond the control of the Postal Service or air carriers; (f) war, insurrection, or civil disturbance; (g) breakdown in the transportation network; or (h) acts of God. See USPS-T-35 at 26. Given the proposed discretionary authority, what prevents the Postal Service from denying all Express Mail postage refund claims? OCA/USPS-T35-6. Given the proposed DMCS language for Express Mail postage refunds, under what condition or conditions will an Express Mail customer be likely to obtain a postage refund when the service commitment has not been achieved?

OCA/USPS-T35-7. If the proposed DMCS language, for Express Mail postage refunds, is adopted, how and when will the Postal Service educate postal patrons about the new changes?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.


Kenneth E. Richardson

Washington, D.C. 20268-0001
October 1, 2001