

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

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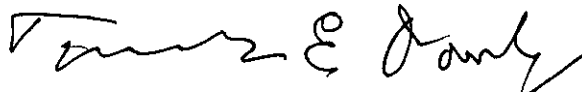
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-99-105)
October 19, 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,



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OCA/USPS-99. The following refers to the attachment to the response of DFC/USPS-1.

- (a) Please provide a copy of "Video Report – Air Carrier Reliability," issued 9/7/01, Final Report Number TV-VR-01-001, Project Number 01NA001TR001.
- (b) Please provide a copy of "Transition Planning for the Priority Mail Processing Center Network," issued 9/28/01, Final Report Number MK-AR-01-003, Project Number 00NA016MK000.

OCA/USPS-100. The following table comes from information provided by the USPS in response to DFC/USPS-5 and DFC/USPS-6.

Priority and First-Class Single Piece Rate Mail - ODIS

FY	Service Std	Mail Category	Percent Mail Delivered w/in Given Std	Avg Days to Delivery		Mail Category	Percent Mail Delivered w/in Given Std	Avg Days to Delivery
1999	Overnight	Priority	85	1.2		SP 1 st Class	93	1.1
2000	Overnight	Priority	84	1.3		SP 1 st Class	92	1.1
2001	Overnight	Priority	82	1.3		SP 1 st Class	91	1.1
1999	Two-Day	Priority	74	2.3		SP 1 st Class	87	2.0
2000	Two-Day	Priority	72	2.4		SP 1 st Class	86	2.0
2001	Two-Day	Priority	68	2.5		SP 1 st Class	84	2.0
1999	Three-Day	Priority	76	3.0		SP 1 st Class	85	2.8
2000	Three-Day	Priority	70	3.2		SP 1 st Class	83	2.8
2001	Three-Day	Priority	67	3.4		SP 1 st Class	79	3.0

- (a) Please confirm that the percentage of mail delivered within the given standard for Overnight Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 – 85% versus FY 2001 – 82%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (b) Please confirm that the percentage of mail delivered within the given standard for Overnight First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 – 93% versus FY 2001 – 91%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (c) Please confirm that the percentage of mail delivered within the given standard for two-day Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 – 74% versus FY 2001 – 68%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (d) Please confirm that the percentage of mail delivered within the given standard for two-day First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 – 87% versus FY 2001 – 84%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (e) Please confirm that the percentage of mail delivered within the given standard for three-day Priority Mail has declined from 1999 to 2001 (e.g., FY 1999 – 76% versus FY 2001 – 67%). If you are unable to confirm, please explain and cite all

source documents used in preparing your response and provide a copy if one has not been previously filed.

- (f) Please confirm that the percentage of mail delivered within the given standard for three-day First-Class Single Piece Mail has declined from 1999 to 2001 (e.g., FY 1999 – 85% versus FY 2001 – 79%). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (g) Please confirm that a comparison of the average days to deliver overnight mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP – 1.1 versus Priority – 1.3 days). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (h) Please confirm that a comparison of the average days to deliver two-day mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP – 2.0 versus Priority – 2.5 days). If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.
- (i) Please confirm that a comparison of the average days to deliver three-day mail indicates that for FY 1999 to FY 2001, First-Class Mail takes less time than does Priority Mail (e.g., FY 2001: First-Class SP – 3.0 versus Priority – 3.4 days)? If you are unable to confirm, please explain and cite all source documents used in preparing your response and provide a copy if one has not been previously filed.

- (j) Please provide copies of all studies, reports and/or analyses performed on the reasons why postal patrons choose Priority Mail, paying more to mail a mail piece weighing up to 13 oz. as Priority Mail (up to 1 lb. = \$3.50), as opposed to mailing the same item at the lower First-Class Single Piece rate (13 oz. = \$3.10 (\$0.34 +(12*\$0.23))).

OCA/USPS-101. Parts of the following interrogatory were asked of USPS witness Mayo as OCA/USPS-T36-7. She responded that she was not aware of any processing centers with scanners that are not compatible with the signature capture program. The object of this interrogatory is to determine if the Postal Service has in its possession information of which witness Mayo was unaware. Therefore, please refer to an advisory report issued May 2, 2001 regarding Certified Mail Observations at the Los Angeles Processing and Distribution Center (Report Number AC-MA-01-002).

- (a) Please identify each and every Processing and Distribution Center (P&DC) that has scanning equipment that is not compatible with the Signature Capture Program. Include in your response the volume of Certified Mail impacted by the lack of compatible scanning equipment during FY 2000 and FY 2001. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (b) For each P&DC that employs the old scanning equipment identified in part "a" of this interrogatory, please explain whether or not the P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents

used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

- (c) Referring to part "b" of this interrogatory, for each and every P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (d) Please identify each and every non-P&DC Postal Service unit or facility that currently handles Certified Mail and uses the "old scanning equipment" that is incompatible with the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each reference used if one has not been previously filed in this docket.
- (e) For each non-P&DC that employs the old scanning equipment identified in part "d" this interrogatory, please explain whether or not the non-P&DC currently participates in the Signature Capture Program. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.
- (f) Referring to part "e" of this interrogatory, for each and every non-P&DC that does not currently participate in the Signature Capture Program, please identify: (1) when the problem of incompatible equipment links with the national database will

be resolved, and (2) how the resolution will be accomplished. If no resolution is expected, please explain why no resolution will be achieved. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

- (g) For each year, FY 2000 and FY 2001, please provide: (1) the number of Certified Mail transactions in which "old scanning equipment" was used; (2) the percentage of Certified Mail transactions in which "old scanning equipment" was used; and (3) information sufficient to show the revenue impact of using the "old scanning equipment" that was not linked to the national database. Provide specific cites to all source documents used in preparing your response and include a copy of each source document referenced if one has not been previously filed in this docket.

OCA/USPS-102. For each of the past three years and for each category or type of Express Mail for which the Postal Service collects data, please provide nationwide data from ODIS, EMRS, and any other applicable systems showing:

- (a) The percentage of the time mail is delivered within the number of days specified by the applicable service standard;
- (b) The average number of days to delivery; and
- (c) The full calculation for each figure requested in parts "a" and "b" of this interrogatory including a description of what each figure used in the calculation represents. Please provide cites to source documents for all figures presented in

calculations and provide copies of the document if one has not been previously filed in this docket.

OCA/USPS-103. For each of the past three years and for each category or type of (a) Express Mail, (b) Priority Mail and (c) First-Class single piece letters, please provide nationwide data from ODIS, EMRS, EXFC and any other applicable systems showing the amount of mail delivered beyond of the number of days specified by the applicable service standard. Please provide the frequency – volume, percentage and average – for mail delivered within 1 to 15 days after the applicable service standard, broken out for each of the fifteen days. In your response, please include the full calculation for each figure requested including a description of what each figure used in the calculation represents. Please provide cites to source documents for all figures presented in calculations and provide copies of any documents that have not been previously filed in this docket.

OCA/USPS-104. The following refers to the Postal Service responses to DFC/USPS-5 and DFC/USPS-6. Please provide the full calculation of each figure provided in the Postal Service's response including a description of what each figure used in the calculation represents. Please provide cites to source documents for all figures presented in calculations and provide copies of any documents that have not been previously filed in this docket.

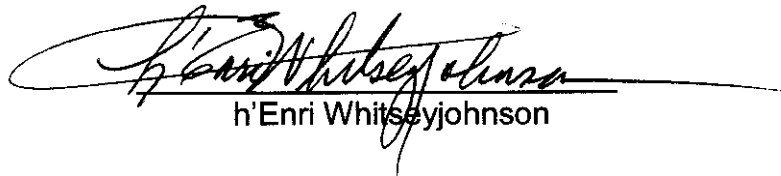
OCA/USPS-105. For each of the past three years and for each of the data systems that collect data on (a) Express Mail, (b) Priority Mail, and (c) First-Class Mail, please

provide a definition of (1) the point of entry into the data collection system (for example, deposit of an envelope into a mailbox) and (2) the point of exit from the data collection system (for example, arrival of a piece of mail at the destination Postal Service facility or physical delivery to the addressee's residence). Please provide cites to source documents and provide copies if one has not been previously filed in this docket.

- (a) If the point of entry and/or the point of exit used in the data system(s) differs from that used to calculate Postal Service's service standards, please provide the alternative definitions used to calculate the service standards and identify how each alternative definition differs from the definition used in the applicable data system(s). Please provide cites to source documents and provide copies if one has not been previously filed in this docket.
- (b) Referring to part "a" of this interrogatory, for each alternative definition, identify all documents that discuss the reason(s) for the adoption of different standards. Please provide cites to these documents and provide copies if one has not been previously filed in this docket.

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.



h'Enri Whitseyjohnson

Washington, D.C. 20268-0001
October 19, 2001