

UNITED STATES OF AMERICA  
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, 2001 )


Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-114-141)  
October 24, 2001

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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

by SSD

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OCA/USPS-114. The following refers to Exhibit 6 of the USPS response to OCA/USPS-34.

- (a) Please confirm that the abbreviation DEC\$ following Insurance, Registered and C.O.D. refers to declared value. If you are unable to confirm, please explain the meaning of DEC\$.
- (b) Please explain what is meant by "ALPHA-F POSTNET-FLAT OFF."
- (c) Please explain what is meant by "ALPHA-Z DESTINATION ZIP LABEL."

OCA/USPS-115. The following refers to Exhibit 4, page 3, of the USPS response to OCA/USPS-24, the column under the Dependent Services header.

- (a) Please confirm that the "Unavailable Services" for the Priority Mail example indicates that Return Receipt and Restricted Delivery are not available. If you are unable to confirm, please explain what is meant by the information appearing under the "Unavailable Services" header.
- (b) Please confirm that return receipt is available for Priority Mail if purchased with one of the following: Certified Mail, COD, mail insured for more than \$50.00, and Registered Mail. If you are unable to confirm, please explain.
- (c) Please confirm that Restricted Delivery is available for Priority Mail if combined with either COD, mail insured for more than \$50.00, Registered Mail or Certified Mail. If you are unable to confirm, please explain.
- (d) If parts "b" and "c" of this interrogatory are confirmed, please explain what is meant by the information referred to in part "a" of this interrogatory.

OCA/USPS-116. The purpose of this interrogatory is to better understand the interrelationships between First-Class, Priority and Express Mail and Special Service offerings. Please provide a complete copy of the "decision trees" used to implement the Primary, Dependent and Unavailable Services for (a) First-Class Mail; (b) Priority Mail and (c) Express Mail on the IBM POS ONE terminal. As an example of decision trees refer to the "decisions" made by the software used to produce the screen displays in response to OCA/USPS-24, Exhibit 4, pages 3 and 5.

OCA/USPS-117. Please refer to your response to OCA/USPS-25(d).

- (a) For an Express Mail article sent to an overnight destination after the retail unit's cut off time, please confirm that the Postal Service Retail Associate is instructed to advise the patron that the package would not be delivered overnight? If you are unable to confirm, please explain.
- (b) Please estimate the likelihood of 2 mail pieces being delivered on the same day to the same Express Mail overnight destination if both pieces are entered into the mail stream after the same retail unit's cut off time. Assume that one mail piece is sent via Express Mail and the other is sent via Priority Mail.
- (c) If your response to part "b" of this interrogatory is that it is likely that the mail pieces would arrive on the same day, please indicate whether or not Retail Associates are instructed to inform postal patrons that, in this type of situation, Express Mail and Priority Mail pieces are likely to be delivered on the same day. If Retail Associates are not instructed to inform postal patrons of the likelihood of delivery occurring on the same day, please explain why not.

- (d) Given that the Retail Associate advises and records that he/she has advised the customer of the Express Mail delivery guarantee, in the event that an article is addressed to a post office box that is inaccessible on weekends or to a street where delivery is not made on weekends and holidays, is the postal patron still eligible for an Express Mail postage refund if the delivery commitment isn't fulfilled?

OCA/USPS-118. Please refer to your response to OCA/USPS-26 and Postal Bulletin 20047 dated (4-5-01), at page 73. The Postal Bulletin's "Retail Coaches' Corner" has the following information for "Tax Time:"

Since April 15 falls on a Sunday, the deadline for mailing tax returns is Monday, April 16. Because Tax Day follows a weekend, we should expect heavier than normal business that day. Procrastinators will be looking for suggestions from you to avoid penalties from the IRS for late filing. Offer Priority Mail with Delivery Confirmation. If they are in a hurry for their returns to get to the IRS, you may suggest Express Mail as well.

Since the "Postal Service does not see itself as a tax adviser for its customers:" please explain why the Service is suggesting Priority Mail with Delivery Confirmation as a way to avoid an IRS penalty for a late filing.

OCA/USPS-119. For FY 2000 and FY 2001 and for each day of the week (e.g., Monday – Friday), please provide the following Express Mail Next Day/Second Day Service data. Please cite your sources and provide a copy of the cited document if one has not been previously filed in this docket. If you are unable to provide an actual value, please provide an estimate.

- (a) The total volume and revenue generated by on each day of the week (for example, Mondays during FY 2000).
- (b) For each day of sales identified in response to (a), please provide the total volume and revenue of Express Mail for which the delivery service standard was not met.

OCA/USPS-120. Where does the revenue and related costs appear in the Postal Service's CRA for postal insurance that is sold in the United States for a package destined to a foreign country?

OCA/USPS-121. Please refer to your response to OCA/USPS-28. The Postal Service responded that the average time it took to deliver an Express Mail piece to the Post Offices identified in the response to OCA/USPS-27 was 3 days for FY 2000 and FY 2001.

- (a) What is the average time it takes to deliver a Priority Mail piece to the Post Offices identified in the Postal Service's response to OCA/USPS-27?
- (b) What is the average time it takes to deliver a First-Class single piece letter to the Post Offices identified in the Postal Service's response to OCA/USPS-27?

OCA/USPS-122. The following interrogatory refers to information provided in response to OCA/USPS-30. Please confirm that the failure rates for Saturday Express Mail service for FY 2000 is 10.7 percent ( $497,939 / 4,675,362 = 10.7\%$  rounded) and for FY 2001 it's 13 percent ( $576,731 / 4,419,905 = 13.0\%$  rounded). If you are unable to

confirm, please provide the mathematical derivations of the corrected amounts. Include cites to source documents and provide a copy of the document if one has not been previously filed in this docket.

OCA/USPS-123. Please refer to your response to OCA/USPS-28. The following refers to all areas where the Postal Service Express Mail average delivery time is greater than 2 days.

- (a) Please provide the total volume and revenue impacted for FY 2000 and FY 2001.
- (b) Has the Postal Service considered offering a "guaranteed" reduced rate third day Express Mail service? If not, please explain why not. If so, please explain why the Postal Service has not proposed such a service.

Include cites to source documents and provides a copy if one has not been previously filed in this doccket.

OCA/USPS-124. Please refer to your response to OCA/USPS-33 and the response to OCA/USPS-30. The response to OCA/USPS-30 part 'b' provides volumes of Express Mail failures. Please confirm that the Postal Service is unable to provide the volume of postage refunds paid because the Postal Service failed to meet the overnight delivery standard. If you are unable to confirm, please provide the volumes that represent the amount of refunds paid in response to OCA/USPS-33(a)(3).

OCA/USPS-125. For FY 2000 and FY 2001, please provide the total volume and total amount of postage refunds paid because the Postal Service failed to meet the 2-day Express Mail delivery standard, if the amount differs from the response to

OCA/USPS-33(a)(3) and OCA/USPS-124. Please cite your sources and provide copies of the documents referenced if one has not been previously filed in this docket. Include in your response the total volume and total revenues paid in FY 2000 and FY 2001, for Express Mail delivery failures.

OCA/USPS-126. What is the total number of Postal Service-staffed retail facilities nationwide?

OCA/USPS-127. Is a Contract Office the same as a Contract Postal Unit? If not, what are the differences?

OCA/USPS-128. What is the total number of Contract Offices nationwide?

OCA/USPS-129. Please give a complete list of the types of terminals used at Postal Service-staffed retail facilities, e.g., POS, IRT, etc.

OCA/USPS-130. Please give a complete list of the types of terminals used at Contract Offices, e.g., POS, IRT, etc.

OCA/USPS-131. Please give a complete list of the types of terminals used at Contract Postal Units, e.g., POS, IRT, etc.

OCA/USPS-132. Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

OCA/USPS-133. Please fill in the following table for Contract Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

OCA/USPS-134. Please fill in the following table for Contract Postal Units. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of facilities with POS Terminals	Percentage of facilities with IRTs	Percentage of facilities with Other Type of Terminal given in response to OCA interrog. #131	Percentage of facilities with Second Type of Terminal given in response to OCA interrog. #131	[Add additional separate columns for each type of terminal given in response to OCA interrog.]



				#131]
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OCA/USPS-135. Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at facilities with POS Terminals	Percentage of transactions at facilities with IRTs	Percentage of transactions at facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of transactions at facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

OCA/USPS-136. Please fill in the following table for Contract Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at facilities with POS Terminals	Percentage of transactions at facilities with IRTs	Percentage of transactions at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of transactions at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

OCA/USPS 137. Please fill in the following table for Contract Postal Units. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of transactions at	Percentage of transactions at	Percentage of transactions at	Percentage of transactions at	[Add additional separate

facilities with POS Terminals	facilities with IRTs	facilities with Other Type of Terminal given in response to OCA interrog. #131	facilities with Second Type of Terminal given in response to OCA interrog. #131	columns for each type of terminal given in response to OCA interrog. #131]
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OCA/USPS-138. Please fill in the following table for Postal Service-staffed retail facilities. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs	Percentage of revenue at facilities with Other Type of Terminal given in response to OCA interrog. #129	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #129	[Add additional separate columns for each type of terminal given in response to OCA interrog. #129]

OCA/USPS-139. Please fill in the following table for Contract Offices. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with POS Terminals	Percentage of revenue at facilities with IRTs	Percentage of revenue at facilities with Other Type of Terminal given in response to OCA interrog. #130	Percentage of revenue at facilities with Second Type of Terminal given in response to OCA interrog. #130	[Add additional separate columns for each type of terminal given in response to OCA interrog. #130]

OCA/USPS-140. Please fill in the following table for Contract Postal Units. Columns 1 – n should sum to 100 percent.

Column 1	Column 2	Column 3	Column 4	Columns 5 - n
Percentage of revenue at facilities with	Percentage of revenue at facilities with	Percentage of revenue at facilities with	Percentage of revenue at facilities with	[Add additional separate columns for

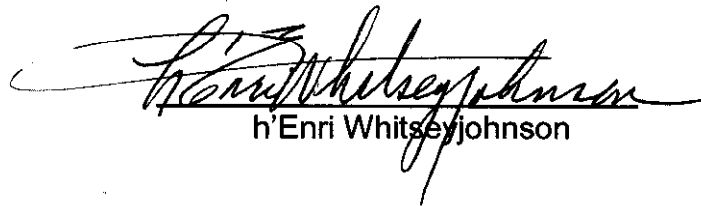
POS Terminals	IRTs	Other Type of Terminal given in response to OCA interrog. #131	Second Type of Terminal given in response to OCA interrog. #131	each type of terminal given in response to OCA interrog. #131]
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OCA/USPS-141. Do Contract Offices use the same types of terminals as retail offices staffed by the Postal Service?

- (a) If not, please explain the methods used by the Contract Offices to inform postal customers about the various postal mailing options available, applicable postage charges, and service standards applicable to items mailed.
- (c) Please identify the types of training provided to Contract Office personnel regarding the various rates and services offered by the Postal Service and include, in your response, a complete set of the training materials, 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 Whitsey Johnson

Washington, D.C. 20268-0001  
October 24, 2001