

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-101-102)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-99-105, filed on October 19, 2001.

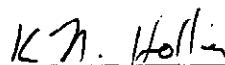
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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November 2, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

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.

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OCA/USPS-101, Page 2 of 2**

(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.

RESPONSE:

(a) Since all P&DCs have compatible scanning equipment, no certified mail is impacted.

(b) All P&DC's that deliver mail are required to participate in the signature capture program. They may continue to use other scanning equipment for non-signature-capture related functions.

(c) Not applicable. See parts a and b.

(d) All non-P&DC sites are using proper scanning equipment for the signature capture program

(e) All U.S. delivery locations, including Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands, participate in the signature capture program.

(f) Not applicable. See parts d and e.

(g) None. See parts a-e.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
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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.

RESPONSE:

ODIS does not collect information about Express Mail. With respect to

EMRS:

- (a) Please see response to DFC/USPS-12.
- (b) The Postal Service does not collect this information.
- (c) Not applicable.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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