

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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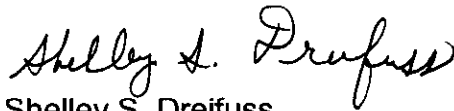
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-248-254)
November 23, 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-248. At <<http://www.usps.com/paymentservices/pspaymnt.htm>> one of the online payment services offered is USPS Pay@Delivery™.

- a. Please describe the operation of this service in detail.
- b. Is this service offered in connection with Priority Mail? Please explain.
- c. Is this form of payment limited to Priority Mail? Please explain.
- d. Is this form of payment available to pay for items shipped by carriers other than the Postal Service, e.g., UPS or Fedex? Please explain.
- e. What was the date of inception for this service?
- f. Please describe the role of the Postal Service in offering this service. Provide all documents describing the role of the Postal Service in offering this service.
- g. Please provide, by fiscal year, since inception, the revenues generated on behalf of the Postal Service by USPS Pay@Delivery™. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- h. Please provide, by fiscal year, since inception, the operating costs incurred by the Postal Service in providing USPS Pay@Delivery™. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- i. What are the total start-up costs since inception for USPS Pay@Delivery™? Please state the source for this answer.
- j. Are the rates charged to customers for USPS Pay@Delivery™ set at a level high enough so that start-up costs for USPS Pay@Delivery™ are recovered over a specific period of time? If so, what is the specific time period? If not, how are the

start-up costs of USPS Pay@Delivery™ being funded? Please state the source for all information provided in response to this question.

- k. Are the rates charged to customers for Pay@Delivery™ high enough to recover the operating costs of USPS Pay@Delivery™? Please provide, by fiscal year since inception, the revenues and the operating costs used to answer the question posed. Please state the source for information used in performing the calculation.
- l. In total, since inception, please provide the net surplus/loss generated by USPS Pay@Delivery™. State whether operating costs alone are used in providing this answer. State explicitly whether start-up costs are added to operating costs in providing this answer.

OCA/USPS-249. Does USPS Pay@Delivery™ function much like COD?

- a. Please list and describe all similarities.
- b. Please list and describe all differences.
- c. Is USPS Pay@Delivery™ a service ancillary to the provision of Priority Mail? Please explain.
- d. If USPS Pay@Delivery™ is offered primarily in connection with Priority Mail and functions much like COD, then why hasn't the Postal Service come to the Postal Rate Commission for a recommended decision on a classification and rate for this service?

OCA/USPS-250. At <<http://www.usps.com/netpost/cardstore/>> one of the online services offered is NetPost™ CardStore.

- a. Please describe the operation of this service in detail.
- b. Are cards purchased through this service mailed as First-Class Mail? Please explain.
- c. Can a customer use NetPost™ CardStore and have a card mailed in any other classes of mail than First Class, e.g., Priority Mail or Express Mail? Please explain.
- d. Is this service available if cards are shipped by carriers other than the Postal Service, e.g., UPS or Fedex? Please explain.
- e. What was the date of inception for this service?
- f. Please describe the role of the Postal Service in offering this service. Provide all documents describing the role of the Postal Service in offering this service.
- g. Please provide, by fiscal year, since inception, the revenues generated on behalf of the Postal Service by NetPost™ CardStore. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- h. Please provide, by fiscal year, since inception, the operating costs incurred by the Postal Service in providing NetPost™ CardStore. For Fy2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- i. What are the total start-up costs since inception for NetPost™ CardStore? Please state the source for this answer.
- j. Are the rates charged to customers for NetPost™ CardStore set at a level high enough so that start-up costs for NetPost™ CardStore are recovered over a

specific period of time? If so, what is the specific time period? If not, how are the start-up costs of NetPost™ CardStore being funded? Please state the source for all information provided in response to this question.

- k. Are the rates charged to customers for NetPost™ CardStore high enough to recover the operating costs of NetPost™ CardStore? Please provide, by fiscal year since inception, the revenues and the operating costs used to answer the question posed. Please state the source for information used in performing the calculation.
- l. In total, since inception, please provide the net surplus/loss generated by NetPost™ CardStore. State whether operating costs alone are used in providing this answer. State explicitly whether start-up costs are added to operating costs in providing this answer.

OCA/USPS-251. With respect to NetPost™ CardStore:

- a. Is NetPost™ CardStore ancillary to the provision of First-Class Mail? Please explain.
- b. Is First-Class Mail ancillary to the provision of NetPost™ CardStore? Please explain.
- c. If NetPost™ CardStore cards are primarily (or mostly) mailed as First-Class Mail, then why hasn't the Postal Service come to the Postal Rate Commission for a recommended decision on a classification and rate for this service?

OCA/USPS-252. At < <http://www.usps.com/netpost/certifiedmail/>> one of the online services offered is NetPost™ Certified Mail.

- a. Please confirm that the following statement is made to describe NetPost™

Certified Mail at the Uniform Resource Locator set forth above:

The U.S. Postal Service now offers traditional certified mail via the Internet. This new service verifies the address, adds the barcode, prints, folds, and completes the certification forms with just a few clicks of a mouse.

All *you* do is create a document, pay online and send.

- b. Please describe the operation of this service in detail.
- c. Please list the classes of postal service to which NetPost™ Certified Mail may be added.
- d. Is this service available for items shipped by carriers other than the Postal Service, e.g., UPS or Fedex? Please explain.
- e. Please confirm that the following statement is made at

<<http://www.usps.com/netpost/certifiedmail/aboutcm.htm>>:

Certified mail service is available for: First-Class Mail and Priority Mail.
Certified Mail using Priority Mail is not yet available through this service.

- f. Please confirm that at

<http://www.usps.com/netpost/certifiedmail/cmfaq.htm#usps>, the FAQs for

NetPost™ Certified Mail contain the following question and answer:

"Is this authentic United States Postal Service Mail?

Yes."

- g. Please confirm that Certified Mail offered under Fee Schedule 941 is subject to the jurisdiction of the Postal Rate Commission.
- h. Since the Postal Service vends NetPost™ Certified Mail as "traditional certified mail" (see quote from part a. of this interrogatory) and "authentic United States

Postal Service Mail” (see quote from part f. of this interrogatory), then should not NetPost™ Certified Mail also be subject to the jurisdiction of the Postal Rate Commission? Please explain.

- i. What was the date of inception for this service?
- j. Please describe the role of the Postal Service in offering this service. Provide all documents describing the role of the Postal Service in offering this service.
- k. What are the rates for NetPost™ Certified Mail? Give the full set of rates that may be paid by NetPost™ Certified Mail customers.
- l. Please provide, by fiscal year, since inception, the revenues generated on behalf of the Postal Service by NetPost™ Certified Mail. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- m. Please provide, by fiscal year, since inception, the operating costs incurred by the Postal Service in providing NetPost™ Certified Mail, please provide this information by AP. Please state the source for all information provided in response to this question.
- n. What are the total start-up costs since inception for NetPost™ Certified Mail? Please state the source for this answer.
- o. Are the rates charged to customers for NetPost™ Certified Mail set at a level high enough so that start-up costs for NetPost™ Certified Mail are recovered over a specific period of time? If so, what is the specific time period? If not, how are the start-up costs of NetPost™ Certified Mail being funded? Please state the source for all information provided in response to this question.

- p. Are the rates charged to customers for NetPost™ Certified Mail high enough to recover the operating costs of NetPost™ Certified Mail? Please provide, by fiscal year since inception, the revenues and the operating costs used to answer the question posed. Please state the source for information used in performing the calculation.
- q. In total, since inception, please provide the net surplus/loss generated by NetPost™ Certified Mail. State whether operating costs alone are used in providing this answer. State explicitly whether start-up costs are added to operating costs in providing this answer.

OCA/USPS-253. With respect to NetPost™ Certified Mail:

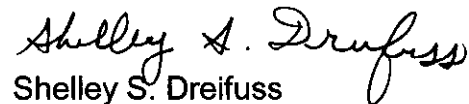
- a. Is NetPost™ Certified Mail offered in connection with Fee Schedule 941 Certified Mail? Please explain.
- b. Is NetPost™ Certified Mail offered in connection with First-Class Mail? Please explain.
- c. Is NetPost™ Certified Mail ancillary to the provision of Fee Schedule 941 Certified Mail? Please explain.
- d. Is Fee Schedule 941 Certified Mail ancillary to the provision of NetPost™ Certified Mail ancillary to the provision of First-Class Mail? Please explain.
- e. Is NetPost™ Certified Mail ancillary to the provision of First-Class Mail? Please explain.
- f. Is First-Class Mail ancillary to the provision of NetPost™ Certified Mail? Please explain.

OCA/USPS-254. Please refer to the response to interrogatory OCA/USPS-74.

Percentage figures were provided for FY 2001 for Express Mail volume accepted for (1) overnight/noon delivery; (2) overnight/3:00 p.m. delivery, and (3) two-day delivery. For the purpose of discerning a trend in Express Mail to offer speedier/slower service to more/fewer customers, please provide comparable percentage figures, broken down in the same three groupings as in the response to interrogatory 74, for FY1990 and FY1995.

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.


Shelley S. Dreifuss

Washington, D.C. 20268-0001
November 23, 2001