

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
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-177, 178, 179 and 182)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-177, 178, 179 and 182, filed on November 9, 2001. Late objections will be filed to interrogatories OCA/USPS-180 and 181.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making:



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November 23, 2001

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-177

The following interrogatory refers to your response to OCA/USPS-75.

- (a) Please provide the number of Postal Service vending machines in the United States.
- (b) Please explain why only 5,000 vending machines currently offer coils of basic First-Class Mail stamps.
- (c) Please explain when all Postal Service vending machines within the United States will dispense "coils" of basic First-Class stamps.
- (d) What criteria does the Postal Service use in determining when to offer coils of basic First-Class stamps in a vending machine?

RESPONSE:

- (a) 31,000.
- (b) All machines are not configured to dispense coils of basic First-Class Mail stamps, due to space/slot restrictions. Those machines that have adequate space to dispense coils have been configured to do so.
- (c) All machines are not capable of dispensing coils and cannot be retrofitted to so do.
- (d) The coils are a basic recommended product; local demand determines if coils will be sold in those machines capable of dispensing them.

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OCA/USPS-178. The following interrogatory concerns shipping chicks and other baby birds.

- (a) Please confirm that FedEx will not handle the shipment of chicks or other small animals via Priority Mail. If you are unable to confirm, please explain.
- (b) Please explain how the USPS currently handles requests from mail-order hatcheries to ship chicks, baby birds and other small animals via Priority Mail.

RESPONSE:

- (a) Confirmed.
- (b) Live animals may be sent as Priority Mail as permitted in Domestic Mail Manual (DMM) C022.3.0 and based on the Postal Service's ability to arrange transportation. Priority Mail containing live animals may only be routed by air transportation when a mailer can meet the conditions cited in Postal Bulletin 22061, dated October 18, 2001 (attached). Currently, Delta, Continental, US Airways and Kitty Hawk accept live animals; Northwest will accept live animals with the exception of baby chicks.

Also, on November 12, 2001, the President signed into law an amendment to section 5402(d) of Title 39 authorizing the Postal Service to "require any air carrier to accept as mail shipments of day-old poultry and such other live animals as postal regulations allow to be transmitted as mail matter." This authority, however, does not apply if the carrier "commonly and regularly" refuses to accept any live animals as cargo.

Domestic Mail

REMINDER

Ongoing Political Campaign Mailings

Several states are conducting elections for statewide and local offices this Fall, and some are conducting special elections for open congressional seats. Campaign mailings for those elections are already being entered into the mail-stream, and they will continue to grow in volume in the coming weeks.

Postal Service managers and employees: Please ensure that you successfully prepare, accept, document, process, and deliver those important mailings.

Managers: Review the political campaign mail procedures documented in *Postal Operations Manual* (POM) 492, Political Campaign Mail. The online version of that POM chapter may be accessed through the Policies and Procedures page of the corporate intranet at <http://blue.usps.gov/cpim>; click on *Manuals*.

— Government Relations,
Government Relations and Public Policy, 10-18-01

CORRECTION

Transportation of Live Animals

Please disregard the article titled "Notice: Transportation of Live Animals" in Postal Bulletin 22060 (10-4-01, pages 24-25). That article listed the incorrect AMC/AMF contact names and phone number for Los Angeles, CA. The correct name and phone number appear in bold in the table shown on page 9.

In response to new Federal Aviation Administration restrictions, the Postal Service is required to adjust the service it provides for the transportation of live animals.

The Postal Service will continue to accept live animals that do not require delivery within a 72-hour period, such as earthworms, lizards, snails, crickets, grasshoppers, and bees, which can move on ground transportation.

In addition, the Postal Service will continue to accept live animals for which the postage is \$3.50 or less for shipment via air transportation.

The Postal Service will provide limited service for live animals for which the postage is more than \$3.50 and that require air transportation, such as day old poultry, adult poultry, and queen honeybees. This service will be available to and from the airports listed in the table below. The customer must present the mail to the applicable AMC/AMF no later than the cut-off time listed below (all times are local). Service will be available from Monday through Friday from the airports listed below.

Mail containing live animals for which the postage is more than \$3.50 should only be accepted at an AMC/AMF, or a retail unit or P&DC as authorized by the AMC/AMF manager. Employees accepting live animals that must be moved on air transportation must contact the appropriate AMC/AMF personnel to ensure that adequate space will be available and that the animals will reach their destination within the required time frame (see DMM C022.3.0). Mailers tendering live animals are also encouraged to contact the appropriate AMC/AMF personnel to facilitate the delivery of service. The list of AMC/AMF contacts in each city is listed below.

POSTAL BULLETIN 22061 (10-18-01)

City	Airport Code	Cut-Off Time	AMC/AMF Contact	Phone Number
Atlanta, GA	ATL	10:45 p.m.	Alton Smith Jacqueline Hicks	404 765-5480
Baltimore, MD	BWI	10:30 p.m.	Rodney Thorington	410 859-2356
Boston, MA	BOS	8:45 p.m.	Terry McWade Steve Cardillo	617 567-0084
Charlotte, NC	CLT	8:30 p.m.	Woodrow McManus Henry Gaddy	704 359-8973
Dallas, TX	DFW	8:00 p.m.	Steve Inglett Olivia Gutierrez	972 456-2000
Denver, CO	DEN	8:30 p.m.	Tom Lujan Dale Wanrow	303 342-3720
El Paso, TX	ELP	7:45 p.m.	Manny Martinez Patsy Green	915 780-7543
Houston, TX	IAH	6:15 p.m.	Ed Martindale Mary Watson Doris Falke	281 443-6350
Huntsville, AL	HSV (Outbound only)	10:00 p.m.	George Hulan Carol Anne Mierzejewski	256 461-6613
Kansas City, MO	MCI	9:00 p.m.	William Cooper Phyllis Kagay Bonnie Roberts	816 243-5751
Los Angeles, CA	LAX	5:00 p.m.	Barbara E. James	310 337-8727
Miami, FL	MIA	7:00 p.m.	Dan Switzer Mary Taylor	305 869-5080
Minneapolis, MN	MSP	7:00 p.m.	Ron Gustafson Sue Lambertz	651 293-3136
Nashville, TN	BNA	9:30 p.m.	Joann Scala Renita Darvin	615 872-5766
Newark, NJ	EWR	8:30 p.m.	Alix Bertrand Don Chesney	973 824-6276
Orlando, FL	MCO	8:45 p.m.	Bob Teal Sam Glover	407 826-5660
Philadelphia, PA	PHL	9:05 p.m.	Ramona Hickman Paul Tillger	215 937-5600
Phoenix, AZ	PHX	5:00 p.m.	Denise Gillanders Deb Grzyb	602 244-9177
Portland, OR	PDX	4:15 p.m.	Linda Nagely Mikeal Kinder	503 335-7910
Seattle, WA	SEA	6:00 p.m.	Kenn Messenger Jerry Dougal	253 437-4200

-- Model Operations and Requirements,
Network Operations Management, 10-18-01

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.**

OCA/USPS-179. For FY 2002, please provide a copy of the advertising copy as well as a copy of each radio and TV script used to market (a) Priority Mail and (b) Express Mail.

RESPONSE

Please see the attached two pages. These are the only responsive ads for FY 2002.

DEAR MR. FORGETFUL:
YOU MIGHT NEED
THE PRODUCT FOR
THE PRODUCT DEMO.

Anna (your assistant)
Palo Alto, CA



Express Mail Service & Priority Mail Service:

✓ fleets of planes ✓ dedicated cargo space ✓ call 1-800-222-1811 for pickup

The U.S. Postal Service is everywhere so you can be anywhere™
www.usps.com

Visit us in booth #959



45 UNITS OF THIS YEAR'S
GOTTA-HAVE-IT-
OR-I'LL-CRY TOY
FOR YOUR SHELVES.

JLB Toys Inc.
St. Paul, MN



Service & Priority Mail® Service:

- ☒ **Special handling**
- ☒ **Dedicated cargo space**
- ☒ **Call 1-800-222-1811 for pickup**

The U.S. Postal Service is everywhere so you can be anywhere.

www.usps.com

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OCA/USPS-182. The following refers to the USPS response to OCA/USPS-83.

- (a) Please provide a copy of the USPS Handbook PO-250, Consumer Answer Book.
- (b) Please provide a copy of the USPS Handbook PO-102, Retail Vending Operational and Marketing Program, Chapter 8, Customer Complaints.
- (c) Page 4 of the Attachment to the response to OCA/USPS-83 indicates that the Customer Complaint Control Log has a column titled "Subject," please explain how USPS personnel categorize complaints into "subjects." What guidelines are USPS personnel given to categorize complaints?

RESPONSE:

- (a) See USPS-LR-J-185. The Handbook provided is the most recent version, printed in 1994. It is out of date and not widely available in the field, which is why consideration is currently being given to the production of an updated version. The Handbook is not relevant to these proceedings, even under the more recent expansion of relevance by the Presiding Officer. However, the Postal Service has chosen to provide it rather than engage in motions practice at this time. The Postal Service reserves the right to object to any follow-up questions regarding its content.
- (b) See USPS-LR-J-185. Once again, the Postal Service does not concede the relevance of this Handbook chapter, and accordingly reserves its right to object to any follow-up questions pertaining to it.
- (c) The only guidelines provided are contained in Management Instruction, PO-250-93-2, a copy of which was attached to the Response of the Postal

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Service to Interrogatories of the Office of Consumer Advocate, OCA/USPS-

83.

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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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