

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

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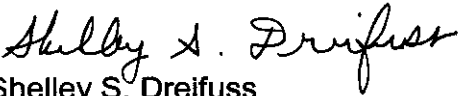
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-255-305)
November 26, 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-255. Please refer to the questionnaire form associated with the U.S. Postal Service Customer Satisfaction Survey, Attachment A to Partial Objection of the United States Postal Service to the Office of the Consumer Advocate's Interrogatory OCA/USPS-7 and Joint Motion for Protective Conditions.

- (a) Please explain how the Postal Service has determined that the Survey is statistically accurate. Please furnish copies of studies, memos, meetings, memoranda, or other documents that address the accuracy of the survey.
- (b) Given that the survey is administered to approximately 200,000 customers on a quarterly basis, please comment on whether the study is accurate on a regional basis, i.e., do levels of satisfaction vary by region of the country? If your answer is affirmative, please provide summary data.
- (c) Given that the survey is administered to approximately 200,000 customers on a quarterly basis, please comment on whether the study is accurate on a demographic basis, i.e., the population as a whole, including such ethnic divisions as Hispanic, African American, Pacific Islander, European origins, etc. If levels of satisfaction differ by ethnic origin, please provide summaries by ethnic origin if the summaries have been prepared.
- (d) Given that the survey is administered to approximately 200,000 customers on a quarterly basis, please comment on whether the study is accurate on an urban/rural/suburban basis. If levels of satisfaction differ on this basis, please provide summaries if the summaries have been prepared.
- (e) Please discuss what changes the Postal Service has considered as a result of responses from the Survey.

- (f) Please discuss what changes the Postal Service has implemented as a result of responses from the Survey.

OCA/USPS-256. Please refer to the questionnaire form associated with the Business Customer Satisfaction Survey, Attachment B to Partial Objection of the United States Postal Service to the Office of the Consumer Advocate's Interrogatory OCA/USPS-7 and Joint Motion for Protective Conditions.

- (a) Please explain how the Postal Service has determined that the Survey is statistically accurate. Please furnish copies of studies, memos, meetings, memoranda, or other documents that address the accuracy of the Survey.
- (b) For each year for which data are provided, please provide the size of sample by type of business. Type of business may be defined in terms of function, e.g., association, light manufacturing, heavy manufacturing, governmental agency, services, etc.; or in terms of SIC code; or in terms of other meaningful disaggregation currently used by the Postal Service.
- (c) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the value of postal services purchased by respondents on an aggregate basis.
- (d) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the number of pieces of mail generated by respondents on an aggregate basis.
- (e) For each year for which data are provided, please describe the types of respondents, e.g. CEO, Senior Managerial, Managerial, Administrative, Mailroom management, mailroom employee, etc. If the Postal Service uses any other

meaningful disaggregation, then data in the form used by the Postal Service would be acceptable.

- (f) Please discuss what changes the Postal Service has considered as a result of responses from the Survey.
- (g) Please discuss what changes the Postal Service has implemented as a result of responses from the Survey.

OCA/USPS-257. Please refer to the questionnaire form "National Account Survey" attached to the Objection of the United States Postal Service to the Office of the Consumer Advocate's Interrogatories OCA/USPS-51-57 and Joint Motion for Protective Conditions.

- (a) Please explain how the Postal Service has determined that the Survey is statistically accurate. Please furnish copies of studies, memos, meetings, memoranda, or other documents that address the accuracy of the Survey.
- (b) For each year for which data are provided, please provide the size of sample by type of business. Type of business may be defined in terms of function, e.g., association, light manufacturing, heavy manufacturing, governmental agency, services, etc.; or in terms of SIC code; or in terms of other meaningful disaggregation currently used by the Postal Service.
- (c) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the value of postal services purchased by respondents on an aggregate basis.

- (d) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the number of pieces of mail generated by respondents on an aggregate basis.
- (e) For each year for which data are provided, please describe the types of respondents, e.g. CEO, Senior Managerial, Managerial, Administrative, Mailroom management, mailroom employee, etc. If the Postal Service uses any other meaningful disaggregation, then data in the form used by the Postal Service would be acceptable.
- (f) Please discuss what changes the Postal Service has considered as a result of responses from the Survey.
- (g) Please discuss what changes the Postal Service has implemented as a result of responses from the Survey.

OCA/USPS-258. Please refer to the questionnaire form "Premier Account Survey" attached to the Objection of the United States Postal Service to the Office of the Consumer Advocate's Interrogatories OCA/USPS-51-57 and Joint Motion for Protective Conditions.

- (a) Please explain how the Postal Service has determined that the Survey is statistically accurate. Please furnish copies of studies, memos, meetings, memoranda, or other documents that address the accuracy of the Survey.
- (b) For each year for which data are provided, please provide the size of sample by type of business. Type of business may be defined in terms of function, e.g., association, light manufacturing, heavy manufacturing, governmental agency,

services, etc.; or in terms of SIC code; or in terms of other meaningful disaggregation currently used by the Postal Service.

- (c) For each year for which data are provided, please summarize the types of respondents, e.g. CEO, Senior Managerial, Managerial, Administrative, Mailroom management, mailroom employee, etc. If the Postal Service uses any other meaningful disaggregation, then data in the form used by the Postal Service would be acceptable.
- (d) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the value of postal services purchased by respondents on an aggregate basis.
- (e) For each year for which data are provided, please provide the mean, standard deviation, and sample size for the number of pieces of mail generated by respondents on an aggregate basis.
- (f) Please discuss what changes the Postal Service has considered as a result of responses from the Survey.
- (g) Please discuss what changes the Postal Service has implemented as a result of responses from the Survey.

OCA/USPS-259. For FY 2000 and FY 2001 (separately), please provide the total volume and revenue of First-Class single piece postage stamps sold at a retail window during the period following Thanksgiving Day up to and including December 24th.

Estimates or proxies are acceptable if exact figures are unavailable. Explain how the figures are calculated. Please provide cites to sources used.

OCA/USPS-260. For FY 2000 and FY 2001 (separately), please provide the average transaction cost of a retail sale of First-Class stamps. An estimate or proxy is acceptable if an exact figure is unavailable. Explain how the figure is calculated.

Please provide cites to sources used.

OCA/USPS-261. For FY 2000 and FY 2001 (separately), please provide the average number of First-Class postage stamps sold during a retail window transaction. An estimate or proxy is acceptable if an exact figure is unavailable. Explain how the figure is calculated. Please provide cites to sources used.

OCA/USPS-262. Has the Postal Service considered offering a discount to mailers for large quantity purchases of First-Class single piece stamps?

- a. If so, please explain each such discount that has been considered. Provide all memoranda, reports, studies, analyses, and any other types of documents or any type of written material, including computer or internet communications reflecting such consideration. Also include copies of slides or graphical presentations reflecting such consideration.
- b. If not, please explain why consideration has not been given to offering a discount for such purchases.

OCA/USPS-263. The Postal Service is proposing to lower the level of insurance (from \$500.00 to \$100.00) automatically included with an Express Mail purchase.

- (a) Please indicate where the reduction in the "automatic" indemnity limit has been reflected as lower Express Mail product costs. Give specific citations (including title, page, and line numbers) to material filed in the instant docket.

- (b) Please state the amount that Express Mail costs have been reduced as a result of the lowered indemnity level (from \$500.00 to \$100.00).

OCA/USPS-264. Please refer to the response to OCA/USPS-60.

- (a) Please provide the on-time percentage for Express Mail overnight pieces for FY 1997 and FY 1998. Please cite the source document(s) and provide a copy of each source document if one has not already been filed in this docket.
- (b) Please provide the on-time percentage for Express Mail second-day pieces for FY 1997 and FY 1998.

OCA/USPS-265. Please provide the overall Priority Mail on-time percentage for FY 1997, FY 1998, FY 1999, FY 2000 and FY 2001. Please state the sources used and give citations to source documents.

OCA/USPS-266. Please provide the overall First-Class on-time percentage for FY 1997, FY 1998, FY 1999, FY 2000 and FY 2001. Please state the sources used and give citations to source documents.

OCA/USPS-267. Please provide the First-Class on-time failure rate for FY 1997, FY 1998, FY 1999, FY 2000 and FY 2001 for the year-to-date period immediately preceding the September 11, 2001 terrorist attack. Please state the sources used and give citations to source documents.

OCA/USPS-268. Please provide a narrative description of the Confirm® program (that uses Planet Codes).

- (a) What are the purposes for which Planet Codes can be utilized?

- (b) What is the general nature and characteristics of the target mail user population to which the Postal Service is offering this service?
- (c) What is the general nature and characteristics of the target mail user population to which the Postal Service may wish to expand this service in the future?
- (d) For what shapes of mailpieces is Confirm® currently available?
- (e) To what shapes of mailpieces will Confirm® be extended in the future?
- (f) Please list the classes of mail for which the Confirm® program now has mailers participating.
- (g) Please state the minimum mail volume required for participation in the Confirm® program.
- (h) Please state the minimum revenue required for participation in the Confirm® program.
- (i) Please identify any other criteria or requirements for participation in the Confirm® program beyond those identified above
- (j) Have the requirements for participation in the Confirm® program evolved since the program was first implemented? If so, please explain how the requirements have changed over time.

OCA/USPS-269. Please provide the operating costs of Confirm®, by fiscal year, for each fiscal year since the inception of the program.

OCA/USPS-270. Please provide the volume of letters in the Confirm® program, by fiscal year, for each fiscal year since the inception of the program.

OCA/USPS-271. Please provide the unit cost for a letter in the Confirm® program for the most recent quarter available. Explain how the unit cost was derived and cite the sources used to perform the calculation.

OCA/USPS-272. Describe the types of procedures, activities, and operations involved in the Confirm® program. Please break out the total cost by each type of cost (for the procedures, activities, and operations listed above) for the most recent fiscal year.

OCA/USPS-273. In a DMNews article dated October 1, 2001, it was reported that Marty Emery, manager of product development at the Postal Service, anticipated an introductory rate of three or four months with a limited amount of scans for \$2000 to \$4000 for Confirm®.

- (a) Is this an accurate account of the Postal Service's plans as of October 1, 2001?
- (b) If so, then what would be the "limited amount of scans" by volume per month?
- (c) How was the \$2000 to \$4000 range determined? What was the cost basis for these figures? Was a contribution to institutional costs included in the \$2000 to \$4000 figures?
- (d) If not, please give a correct description of the Postal Service's plans as of October 1, 2001.
- (e) This article also reported that Mr. Emery stated that a one-year subscription rate for one unique mailer ID and 50 million scans was planned in the \$5000 to \$7000 range.

- (f) Is the description in part (e) above an accurate account of the Postal Service's plans as of October 1, 2001? If not, please give a correct description of the Postal Service's plans as of October 1, 2001.
- (g) If so, then please confirm that 50 million scans for \$5000 to \$7000 computes to 0.0001 cent to 0.00014 cent per scan.
- (h) How was the \$5000 to \$7000 range determined? What was the cost basis for these figures? Was a contribution to institutional costs included in the \$5000 to \$7000 figures?
- (i) This article also reported that Mr. Emery stated that a one-year subscription rate for three unique mailer IDs and unlimited scans was planned in the \$14,000 to \$17,000 range.
- (j) Is the description in part (i) above an accurate account of the Postal Service's plans as of October 1, 2001? If not, please give a correct description of the Postal Service's plans as of October 1, 2001.
- (k) How was the \$14,000 to \$17,000 range determined? What was the cost basis for these figures? Was a contribution to institutional costs included in the \$14,000 to \$17,000 figures?
- (l) Please explain how a greater number of mailer IDs adds to the cost of providing the service.

OCA/USPS-274. Please confirm that the August 2001 issue of Memo to Mailers reported that nearly 600 mailers were then participating in the Confirm® program.

- (a) Also confirm that John Ward of the Postal Service stated that Confirm® provides "a meaningful performance measurement."

- (b) Please provide First-Class performance data that the Postal Service has collected through its Confirm® program, by fiscal year, since its inception. Please express these data as average number of days for overnight (Confirm®) First-Class letters to be delivered; average number of days for second-day (Confirm®) First-Class letters to be delivered; and average number of days for third-day (Confirm®) First-Class letters to be delivered.
- (c) Also provide the average number of days overall for (Confirm®) First-Class letters to be delivered, by fiscal year, since inception.
- (d) Please use the three figures calculated for part (b) of this question to determine the following three on-time percentages – for overnight (Confirm®) First-Class letters to be delivered; for second-day (Confirm®) First-Class letters to be delivered; and for third-day (Confirm®) First-Class letters to be delivered.
- (e) What is the average volume mailed by the “nearly 600” participating mailers?
- (f) What classes of mail are represented by the “nearly 600” participating mailers?
- (g) What shapes of mailpieces, by class of mail, are represented in the Confirm® volumes generated by the “nearly 600” participating mailers?

OCA/USPS-275. Please confirm that at page 35 of the United States Postal Service 2000 Comprehensive Statement on Postal Operations, it is stated that:

CONFIRM enables senders or recipients of mail to track the delivery of letters and achieve desired business results through the use of unique bar codes called PLANET CODEs. A more robust production system was developed which is sufficient to serve an unlimited number of customers. Development of hardware and software to enable all bar code sorters in major processing plants to read PLANET CODE indicia was achieved. Deployment of CONFIRM capability for bar code sorters in smaller associate offices and delivery units has begun, with completion anticipated in 2001.

- (a) Based on this description, by the beginning of 2002, will Planet Code subscribers be able to track individual mailpieces from the first bar code scan at an outgoing plant, for each intermediate scan as the mailpiece is processed on bar code sorters at intermediate plants, and for final scans at associate offices and delivery units? If this description is not correct, then please restate it so as to be correct.
- (b) In the quote above, does 2001 mean calendar year or fiscal year? Please explain.
- (c) What types of facilities comprise the "major processing plants" from the quote above?
 - (i) How many such facilities are there?
 - (ii) What types of equipment must they have to scan Planet Codes successfully?
 - (iii) Are all P & DCs (processing and distribution centers) equipped to scan Planet Code letters? If not, what percentage of P & DCs are not able to do so?
- (d) With respect to the "smaller associate offices and delivery units" from the quote above, how many such facilities will be able to scan Planet Codes successfully?
 - (i) What percentage of total small associate offices and delivery units do they comprise?
 - (ii) How many small associate offices and delivery units will be unable to scan Planet Codes?

- (iii) Is the lack of bar code sorters the reason that some small associate offices and delivery units will be unable to scan Planet Codes?
- (iv) What percentage of total small associate offices and delivery units will be unable to scan Planet Codes?
- (e) Has the Postal Service reached the deployment goals described in the quote above? If not, when will the deployment goals be reached? If not, what additional steps must be taken to reach the deployment goals?

OCA/USPS-276. Please confirm that at page 47 of the United States Postal Service 2000 Comprehensive Statement on Postal Operations, it is stated that:

The Postal Service has nearly completed deployment of PLANET/CONFIRM capability for flat mailers. . . . PLANET/CONFIRM provides mailers information regarding origin or destination confirmation, address correction, forwarding tracking. During 2000, this capability was added to the FSM 881s and FSM 1000s; it will be extended to the AFSM 100s in early 2001.

- (a) Has the Postal Service now completed deployment of PLANET/CONFIRM capability for flat mailers?
- (b) If so, when was the deployment completed?
- (c) If not, when will deployment be completed?
- (d) Has the PLANET/CONFIRM capability been added to the AFSM 100s?
- (e) If so, when was this accomplished?
- (f) If not, when will this be accomplished?
- (g) Once deployment of PLANET/CONFIRM capability for flat mailers is completed, what classes of mail will be able to participate in the program for flats?
- (h) Are any flat mailers now participating in the PLANET/CONFIRM program?

- (i) If so, how many?
- (j) What classes of mail do they represent?
- (k) Does the Postal Service anticipate extending participation in the PLANET/CONFIRM program to mailers of flats in all classes of mail?
- (l) If not, which classes of mail will be excluded? What are the reasons for such exclusions?
- (m) Please state all minimum volume, revenue, or other criteria for participation in the PLANET/CONFIRM program for flat mailers.

OCA/USPS-277. Please state whether the Postal Service has considered methods for extending the tracking capabilities of PLANET/CONFIRM to small businesses and individual mailers. If so, what were the results of such consideration? Are there any plans to extend PLANET/CONFIRM to small businesses and individual mailers? Please describe such plans fully.

OCA/USPS-278. Has the Postal Service performed any studies or analyses of the feasibility of offering the opportunity to participate in PLANET/CONFIRM to small businesses and individual mailers? If the answer is negative, please explain why not. If the answer is that such studies or analyses have been performed, please cite each such document and provide a copy of the document(s) if one has not previously been filed in this docket.

OCA/USPS-279. Please state whether the Postal Service has given consideration to the feasibility of selling Planet-coded envelopes on a retail basis so that small business

and individual mailers could track the movements of such envelopes through the postal network.

- (a) If so, what was the result of such consideration?
- (b) Are there any significant obstacles to developing such a product?
- (c) If so, what are these obstacles?
- (d) How could such obstacles be overcome?

OCA/USPS-280. Please provide copies of all materials used to explain to potential customers the ways in which they could use PLANET/CONFIRM and the reasons why doing so would be in the interest of the potential customer's business.

OCA/USPS-281. What percentage of machinable First-Class letters is processed on one or more barcode sorters? Please give a cite for the information provided.

OCA/USPS-282. What percentage of machinable First-Class flats is processed on flat-sorting equipment fitted with Planet-Code scanning capability?

- (a) What percentage of machinable First-Class flats is manually processed?
- (b) What percentage of First-Class flats is machinable?

Please give estimates or proxies for the above if exact figures are unavailable. Explain the method and sources for calculating such estimates or proxies.

OCA/USPS-283. What percentage of machinable Periodicals flats is processed on flat-sorting equipment fitted with Planet-Code scanning capability?

- (a) What percentage of machinable Periodicals flats is manually processed?
- (b) What percentage of Periodicals flats is machinable?

Please give estimates or proxies for the above if exact figures are unavailable. Explain the method and sources for calculating such estimates or proxies.

OCA/USPS-284. What percentage of machinable Priority Mail flats is processed on flat-sorting equipment fitted with Planet-Code scanning capability?

- (a) What percentage of machinable Priority Mail flats is manually processed?
- (b) What percentage of Priority Mail flats is machinable?

Please give estimates or proxies for the above if exact figures are unavailable. Explain the method and sources for calculating such estimates or proxies.

OCA/USPS-285. What percentage of machinable Standard A flats is processed on flat-sorting equipment fitted with Planet-Code scanning capability?

- (a) What percentage of machinable Standard A flats is manually processed?
- (b) What percentage of Standard A flats is machinable?

Please give estimates or proxies for the above if exact figures are unavailable. Explain the method and sources for calculating such estimates or proxies.

OCA/USPS-286. Has the Postal Service ever considered offering Delivery Confirmation for First-Class letters?

- (a) If so, what was the outcome of such consideration?
- (b) Are there any significant obstacles to offering Delivery Confirmation to First-Class letters?
- (c) If so, what are such obstacles?
- (d) How could such obstacles be overcome?

OCA/USPS-287. Are certified mail letters separated from non-certified mail letters during Delivery Point sortation?

- (a) If so, describe how this separation is accomplished.
- (b) If not, then where and how is such a separation made?

OCA/USPS-288. Are registered letters separated from non-registered letters during Delivery Point sortation?

- (a) If so, describe how this separation is accomplished.
- (b) If not, then where and how is such a separation made?

OCA/USPS-289. Would it be feasible to sell Delivery Confirmation service for First-Class letters involving application of a Delivery Confirmation bar-coded label and to separate such letters in the same manner that certified mail letters and registered letters are separated from the rest of the letter mailstream? Please explain fully. Include in this explanation any significant obstacles to providing such a service and how such obstacles could be overcome.

OCA/USPS-290. Would it be feasible for the Postal Service to sell Planet-coded Priority Mail envelopes (whose contents would be restricted so as to remain machinable) and pair them with Delivery Confirmation service so as to offer a trackable Priority Mail service? Please explain fully.

- (a) Are there any significant obstacles to providing such a service?
- (b) If there are significant obstacles, how could they be overcome?
- (c) Wouldn't such a service make Priority Mail more competitive with FedEx and UPS second-day services? Please explain.

OCA/USPS-291. In the April 2, 2001, issue of *Postal World*, it was reported that:

Major mailers can parlay their volume with USPS into special rates for ads on the Postal Service's delivery trucks, collection boxes and packaging.

. . . .

Mailers, especially those who are prepared to boost their volume substantially, will be given preferential rates vs. those who are only interested in the truck, collection box or envelope ads alone.

- (a) Is this correct?
- (b) How much of a discount is given to major mailers?
- (c) Why are smaller volume mailers excluded from such discounts?
- (d) Please confirm that this practice is a discriminatory to smaller volume mailers. If you do not confirm, then explain fully.
- (e) Isn't it correct that this practice can be viewed as an unauthorized discount for large volume mailers without review and action from the Postal Rate Commission? If the answer is negative, then explain fully.

OCA/USPS-292. Please compare end-of-the-day mailbox collection times for the following fiscal years: FY1995, FY 1997, FY1999, FY2000, and FY2001.

- (a) State separately for each of the five fiscal years listed, re weekday collections, the percentage of mailbox end-of the-day collection times occurring at earlier than 2 p.m., 2 p.m. – 2:59 p.m., 3 p.m. – 3:59 p.m., 4 p.m. – 4:59 p.m., 5 p.m. – 5:59 p.m., 6 p.m. – 6:59 p.m., and 7 p.m. or later.
- (b) State separately for each of the five fiscal years listed, re Saturday collections, the percentage of mailbox end-of the-day collection times occurring at earlier than 10 a.m., 10 a.m. – 10:59 a.m., 11 a.m. – 11:59 a.m., 12 p.m. – 12:59 p.m.,

1 p.m. – 1:59 p.m., 2 p.m. – 2:59 p.m., 3 p.m. – 3:59 p.m., 4 p.m. – 4:59 p.m., 5 p.m. – 5:59 p.m., and 6 p.m. or later.

OCA/USPS-293. What was the number of Sunday mail box collections for each of the following fiscal years: FY1995, FY 1997, FY1999, FY2000, and FY2001?

OCA/USPS-294. Please provide the following information as an EXCEL spreadsheet or a format compatible with EXCEL. Of the 849,106 valid three-digit ZIP Code pairs, please provide by three-digit ZIP Code pair the First-Class, Priority and Express Mail service standards only for pairs that have one-, two-, or three-day service standards. Specify separately for each pair and each class (i.e., First, Priority, and Express) whether the ZIP code pair has a one-, two-, or three-day standard.

OCA/USPS-295. Please refer to PRC Op. R2000-1, para. 5301. There the Commission stated:

While there appears to be some origin-destination pairs where Priority Mail has a higher standard of service than First-Class this is not the general rule. Customers presently can not easily determine from the Service's website or from information at post offices when different service standards exist. The Service should take steps to assure that customers are not misled into purchasing a more expensive product that will not provide added service.

- (a) What is the possible total number of origin-destination pairs?
- (b) Please give the number of origin-destination pairs for which the Priority Mail service standard is higher than that of First Class.
- (c) Please give the number of origin-destination pairs for which the First-Class service standard is higher than for Priority Mail.

- (d) Please list and describe fully all steps taken by the Postal Service since the issuance of the R2000-1 opinion that allow customers to “easily determine from the Service’s website . . . when different service standards exist.” Provide all memoranda, bulletins, policy statements, and any other written material or documentation addressing this issue.
- (e) Please list and describe fully all steps taken by the Postal Service since the issuance of the R2000-1 opinion that allow customers to “easily determine from . . . information at post offices when different service standards exist.” Provide all memoranda, bulletins, policy statements, and any other written material or documentation addressing this issue.
- (f) Please list and describe fully all steps taken by the Postal Service since the issuance of the R2000-1 opinion that allow customers to “assure that customers are not misled into purchasing a more expensive product that will not provide added service.” Provide all memoranda, bulletins, policy statements, and any other written material or documentation addressing this issue. In addition to the material requested in the previous sentence, specifically state all measures put in place by the Postal Service to require clerks and ASK-USPS representatives to give potential customers of First Class and Priority Mail all of the information necessary to see whether the purchase of the much higher priced Priority Mail service will result in speedier delivery (based upon service standards) of the mailpiece.

OCA/USPS-296. Please refer to Tr. 7/2716, Docket No. R2000-1. Please provide comparable figures for unidentified Priority Mail that is handled as First Class for FYs

1999, 2000, and 2001. What is the source for this information? Please give citations to source documents and provide them if they are not already on file with the Commission.

OCA/USPS-297. Please describe the process used by the Postal Service to ensure that POS-1 terminals contain accurate information about First-Class delivery times.

OCA/USPS-298. Please describe the process used by the Postal Service to ensure that POS-1 terminals contain accurate information about Priority Mail delivery times.

OCA/USPS-299. Please describe the process used by the Postal Service to ensure that POS-1 terminals contain accurate information about Express Mail delivery times.

OCA/USPS-300. Please describe the process used by the Postal Service to ensure that non-POS offices contain accurate information about First-Class delivery times. What materials are provided to non-POS offices for this purpose? What measures of accuracy are employed?

OCA/USPS-301. Please describe the process used by the Postal Service to ensure that non-POS offices contain accurate information about Priority Mail delivery times. What materials are provided to non-POS offices for this purpose? What measures of accuracy are employed?

OCA/USPS-302. Please describe the process used by the Postal Service to ensure that non-POS offices contain accurate information about Express Mail delivery times. What materials are provided to non-POS offices for this purpose? What measures of accuracy are employed?

OCA/USPS-303. Please provide the same information for First-Class Mail that was provided in response to interrogatory OCA/USPS-24 for Priority Mail.

OCA/USPS-304. In response to interrogatory OCA/USPS-80, it is stated:

[T]he 2-day service standard range is much wider for Priority Mail than for First-Class Mail. In fact, while the majority of Priority Mail's three-digit ZIP Code pairs have a 2-day service standard, the majority of First-Class Mail's three-digit ZIP Code pairs have a 3-day service standard.

- (a) Give the total number of 3-digit ZIP Code pairs referred to in the response.
- (b) Give the number of ZIP Code pairs subject to a 2-day service standard separately for Priority Mail and First Class.
- (c) Give the number of ZIP Code pairs subject to a 3-day service standard separately for Priority Mail and First Class.
- (d) Also give the number of ZIP Code pairs subject to an overnight standard separately for Priority Mail and First Class.

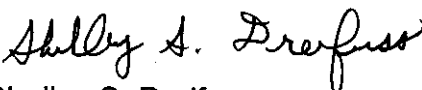
OCA/USPS-305. Please refer to the USPS response to OCA/USPS-177(d).

- (a) Please provide the criteria used by the Postal Service when it determined where the 5,000 vending machines that currently offer coils of basic First-Class Mail stamps were to be located.
- (b) Please provide the criteria the Postal Service uses to determine what the local demand is for vending machine dispensed coils of First-Class Mail stamps.
- (c) The following refers to the response to OCA/USPS-75(b). If the Postal Service does purchase additional vending machines that are capable of processing credit cards as a method of payment, is the Postal Service going to include, in the machine configuration, slots that will dispense coils of basic First-Class Mail

stamps? If not, please explain why not. If so, please include an estimate of the number of machines that will be purchased and the criteria the Postal Service will use in determining the geographic location of the machines.

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 26, 2001