

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

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO OCA/USPS-  
231-233, 243, 245-247, 268-285 and 290 AND PARTIAL OBJECTION TO  
OCA/USPS-239-242, 244, 248-253  
(December 3, 2001)**

The United States Postal Service hereby objects in full to interrogatories OCA/USPS-231-233, 243, 245-247, 268-285 and 290, and in part to interrogatories OCA/USPS-239-242, 244, 248-253 on a variety of grounds, discussed in more detail with respect to specific interrogatories, below.<sup>1</sup> The primary basis for the objections, however, is that the information requested lacks relevance to this proceeding. Before turning to more specific objections, the Postal Service believes that some general comments on the topic of relevance are in order.

Lest anyone has forgotten, this is a proceeding to establish postal rates, fees and classifications. It is not a rate or service complaint case, a post office closing case, a nationwide service change case, or a court case dealing with advertising or trade practices. In fact, there are other provisions of law that explicitly provide for those types of cases and that establish appropriate

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<sup>1</sup> The pertinent interrogatories are attached as Appendix A. The interrogatories span three different sets from the OCA. Separate objections to other interrogatories in those sets may be filed. Also, with regard to these objections, the Postal Service does not even attempt to address each and every part and subpart of each interrogatory; rather the interrogatories are discussed primarily in groups, with certain subparts at times used as illustrative examples.

remedies. Yet, for reasons that remain unclear, instead of focusing on the Postal Service's proposals, OCA keeps attempting to convert this proceeding into something other than what it is. While this would be a problem under any circumstances, it is particularly troublesome here, where OCA's bombardment of the Postal Service with detailed questions having nothing to do with the case is draining valuable resources at a time when they are increasingly scarce and needed elsewhere.

Moreover, the Postal Service, equally with all other participants in postal rate proceedings, is entitled to due process. The Postal Service, like others, should have a full and fair opportunity to present its case. That full and fair opportunity is significantly infringed if time and effort are devoted to matters that will not materially assist in the setting of rates and fees and the establishment of mail classifications. The mailing public, including large, business mailers as well as individual consumers, and postal competitors, are also harmed from this lack of focus on the matters at hand. They are entitled to rates, fees and classifications that meet the criteria of the Act. Time squandered on other issues threatens the entire ratemaking process.

It is thus difficult to fathom OCA's motivations with some of these latest interrogatories. Does OCA really believe that, for example, answering such questions as why an ASK-USPS representative would purportedly make certain statements has anything to do with *this* proceeding? Even assuming that such statements were in fact made, and that the Postal Service can or should investigate whether and why a particular individual might have made particular

statements, this type of inquiry is far removed from the issues in this case. How is the ratemaking process served, given the proposals at issue in **this** proceeding, by this type of inquiry? How does this “assist in the development of a complete record **on issues pending before the Postal Rate Commission?**” See [www.prc.gov/](http://www.prc.gov/) Tell the OCA/OCA Mission Statement; 39 C.F.R. , Part 3002, Appendix A (emphasis added). How does this help “the Commission fulfill its official responsibilities to recommend **fair and equitable rates and mail classifications** for the United States Postal Service?” See [www.prc.gov/](http://www.prc.gov/) Tell the OCA/Role of the OCA (emphasis added).

More detailed objections to specific interrogatories are discussed below.

#### **OCA/USPS-231-233 (full objection)**

These interrogatories all pose a series of questions based on snippets of a few purported conversations between unidentified OCA staff members and unidentified ASK-USPS representatives that took place on unspecified dates at unspecified times. These bits and pieces of purported conversations serve as the launching pad for multiple subparts probing wide-ranging questions on numerous aspects of Express, Priority and First-Class Mail transportation, processing and delivery, as well as the training, thought processes and motivations of ASK-USPS representatives. The Postal Service objects to answering any of these questions.

First, no factual foundation has been established for these interrogatories. With the lack of detail presented by OCA, how can anyone even know that the conversations took place, much less assume that they were reported accurately

or assume that the parts reported fully and fairly capture the meaning and context of the entire conversation?

Second, even assuming that the conversational fragments reported in OCA's questions are accurate, there has been absolutely no showing by OCA that these are typical, standard answers and comments given by most or all ASK-USPS representatives. There is no showing that remarks made concerning a few, lone ZIP Code origin-destination pairs reflect any sort of national policy or process. The absence of any such showing makes the lack of relevance of these inquiries manifest.

And these particular inquiries certainly lack relevance. How will it advance the issues in this case, for example, to know "all instances in which a Priority Mail piece 'travels on the same transportation as Express Mail' for each leg of transportation?" This is not a legitimate inquiry into transportation issues in this case. It does nothing to aid in determining whether transportation costs have been measured and allocated properly to the subclasses of mail. Rather, its purpose seems to be to test the knowledge and veracity of the ASK-USPS representative. While that might interest the OCA, it has nothing to do with establishing rates, fees and classifications.

Further, some of the questions, even assuming they could be answered, are overbroad and would be unduly burdensome to answer. For example, OCA/USPS-231(m) states:

Please provide copies of any Postal Service policy statements, bulletins, scripts, memoranda, directives, training material, or any other type of written statement or document transmitted from any level of the Postal Service to another (or within any level) that the ASK-USPS representative

might have referred to or been aware of as a basis for refusing to state specific First-Class delivery times. In addition to any written material, provide such material if the medium used to convey the message is electronic, via computer screen display, internet, in audio or video form.

How in the world is the Postal Service supposed to respond to this question? It cannot possibly even begin to guess everything that this ASK-USPS representative (or any other) might have seen, heard, assumed, interpreted or misinterpreted in making the alleged statements. The question is clearly overbroad. Also, the Postal Service obviously cannot contact this particular ASK-USPS representative and attempt to find out what information he/she might have relied upon, because the OCA has not identified the individual. It would seem, then, that the only way to attempt to answer would be for the Postal Service to contact every ASK-USPS representative for the information or, in the alternative, have a statistician derive a random sample of ASK-USPS representatives and query all in the sample. Either option is ridiculous, and the Postal Service cannot even begin to estimate the time and effort that would be involved in attempting to respond. And, of course, the information obtained would be totally irrelevant since OCA has made no showing that the remarks (even assuming they occurred exactly as OCA has represented) are anything other than isolated instances.

**OCA/USPS-239 and 240 (partial objection)**

These interrogatories ask for operating revenue, operating expenses and operating income/loss figures for various non-postal services -- Post ECS, Electronic Postmark, First-Class Phone Cards, Retail Merchandise, Post Office Online, Liberty Cash, Dinero Seguro, REMITCO and Sure Money. The Postal Rate Commission does not have jurisdiction over non-postal products or

services. The Postal Service thus does not see the relevance of the requested information. In addition, the environment in which the Postal Service operates has become increasingly competitive, even since the last rate case, and the Postal Service thus submits that the information is commercially sensitive. Nonetheless, the Postal Service will produce the same information it made available in Docket No. R2000-1 for these non-postal products and services. The information will be made available in the same way in which it is reported – i.e., by quarter rather than by AP, for the most recent quarter available. By supplying this limited information, however, the Postal Service does not intend to waive its right to object to any follow-up discovery on these or other non-postal services, in this or any other proceeding.

**OCA/USPS-241 and 242 (partial objection)**

OCA/USPS-241 asks a series of questions concerning detailed aspects of the finances and operations of USPS eBillPay™ -- for example, "In what percentage of instances are bills presented in electronic format?" As another example, there are subparts inquiring about whether the rates charged to consumers cover the operating costs, and what the operating cost per bill is. Again, this is a non-postal service and as such, has no relevance to the issues in this case. In addition, the Postal Service submits that the information is commercially sensitive. The Postal Service, however, as it did in Docket No. R2001-1 for other non-postal services, will provide a description of the service and the same financial information – operating expense and revenues and operating income/loss up through the most recent quarter. The Postal Service

objects, however, to providing anything further. Again, by providing this information, the Postal Service does not intend to waive its right to object to further inquiries.

OCA/USPS-242 asks why the Postal Service has not requested a recommended decision from the Commission on a classification and rate for USPS eBillPay™ and further asks several questions about whether First-Class Mail and eBillPay™ are “ancillary” to each other. The Postal Service objects to answering this interrogatory on the grounds that it calls for a legal conclusion. Also, the questions asked are irrelevant, since eBillPay™ is a non-postal service.<sup>2</sup> The Postal Service will answer subparts (a) and (b) of the interrogatory, however, by referring back to the description of the service that will be provided in the previous interrogatory response (OCA/USPS-241). That previous response may partially and indirectly address some of the issues raised in the instant subparts. The Postal Service will not provide a response, however, to the part of the interrogatory inquiring about why the Postal Service has not sought a recommended decision from the Commission.

**OCA/USPS-243 (full objection)**

This interrogatory asks how the Postal Service “backs” eBillPay™, whether consumers are reimbursed in certain circumstances, and whether such reimbursements are included in operating costs. These detailed inquiries about the financial and operational characteristics of a non-postal service have no

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<sup>2</sup> To the extent anyone believes that eBillPay™ is a postal service, falling within the Commission’s jurisdiction, there potentially are legal avenues to present such an argument; an omnibus rate proceeding plainly is not one of them.

place in this proceeding. They are not relevant to the issues and responding could reveal commercially sensitive information.

**OCA/USPS-244 (partial objection)**

This question is similar to OCA/USPS-241, inquiring about detailed aspects of the finances and operations of a particular non-postal service, except this time the service is USPS Send Money. Again, this is a non-postal service and as such has no relevance to the issues in this case. In addition, the Postal Service submits that the information related to this service is commercially sensitive. The Postal Service, however, as it did in Docket No. R2001-1 for other non-postal services, will provide a description of the service and the same financial information – operating expense and revenues and operating income/loss up through the most recent quarter. The Postal Service objects, however, to providing anything further. Again, by providing a partial response, the Postal Service does not intend to waive its right to object to further inquiry on this topic.

**OCA/USPS-245 and 246 (full objection)**

OCA/USPS-245 asks how the Postal Service “backs” USPS Send Money, whether consumers are reimbursed in certain circumstances, and whether such reimbursements are included in operating costs. Again, these detailed inquiries about the financial and operational characteristics of a non-postal service have no place in this proceeding. They are not relevant to the issues and responding could reveal commercially sensitive information.



OCA/USPS-246 asks why the Postal Service has not requested a recommended decision from the Commission on a classification and rate for USPS Send Money. The Postal Service objects to answering this interrogatory on the grounds that it calls for a legal conclusion. Also, it is irrelevant since the service in question is non-postal.

**OCA/USPS-247 (full objection)**

This interrogatory describes a phone call on the part of an individual Post Office Box customer in Stanton, Nebraska who was "baffled about the reason that his Post Office Box fees had increased many times the level of inflation" from late 1998 to January, 2001. OCA uses this story as the pretext for asking several questions concerning why there have been such fee increases in particular Post Office box fee groups. The Postal Service is equally "baffled" why OCA is asking these questions in this docket. Post Office Box increases from late 1998 through January, 2001 have been fully litigated in previous dockets. The increases in *this* docket are all that is at issue here. The information requested in this interrogatory illustrates both its irrelevance and the apparent failure of OCA to review material which it was heavily involved in the litigation of.

**OCA/USPS-248 and 249 (partial objection)**

As with the previous interrogatories concerning eBillPay™ and USPS Send Money, OCA/USPS-248 asks a series of questions concerning detailed aspects of the finances and operations of USPS Pay@Delivery™. For the same reasons discussed above with respect to eBillPay™ and USPS Send Money, the Postal Service objects to providing the requested information due to lack of

relevance and commercial sensitivity. Again, however, the Postal Service will provide a description of the service and the same financial information – operating expense and revenues and operating income/loss up through the most recent quarter. The Postal Service objects, however, to providing anything further. Again, by providing this information, the Postal Service does not intend to waive its right to object to further inquiry on these topics.

OCA/USPS-249 asks for similarities and differences between Pay@Delivery™ and COD (subparts (a) and (b)), asks if Pay@Delivery™ is ancillary to Priority Mail (subpart (c)), and asks why the Postal Service has not requested a recommended decision from the Commission on a classification and rate for Pay@Delivery™ (subpart (d)). The Postal Service objects to answering this interrogatory on the grounds that it calls for a legal conclusion. Also, the questions asked are irrelevant, since Pay@Delivery™ is a non-postal service. The Postal Service will answer subparts (a)-(c) of the interrogatory, however, by referring back to the description of the service that will be provided in the previous interrogatory response (OCA/USPS-248). That previous response may partially and indirectly address some of the issues raised in the instant subparts. The Postal Service will not respond, however, to subpart (d).

**OCA/USPS-250 and 251 (partial objection)**

OCA/USPS-250 asks a series of questions concerning detailed aspects of the finances and operations of NetPost™ CardStore. For the same reasons discussed above with respect to other non-postal services, the Postal Service objects to providing the requested information due to lack of relevance and

commercial sensitivity. Also, in this instance, the service is provided through another company, with whom the Postal Service has contracted. The Postal Service will provide a description of the service, as well as the Postal Service's operating expenses and revenues, and operating income/loss up through the most recent quarter. The Postal Service will not provide any similar financial information from its contractor, nor will it provide anything further in response to other interrogatory subparts. By supplying a limited response, the Postal Service in no way intends to waive its right to object to further discovery on this topic.

OCA/USPS-251 asks whether NetPost™ CardStore and First-Class Mail are "ancillary" to each other (subparts (a) and (b)) and also inquires why the Postal Service has not requested a recommended decision from the Commission on a classification and rate for NetPost™ CardStore (subpart (c)). The Postal Service objects to answering this interrogatory on the grounds that it calls for a legal conclusion. Also, the questions asked are irrelevant, since NetPost™ CardStore is a non-postal service. The Postal Service will answer subparts (a) and (b) of the interrogatory, however, by referring back to the description of the service that will be provided in the previous interrogatory response (OCA/USPS-250). That previous response may partially and indirectly address some of the issues raised in the instant subparts. The Postal Service will not respond, however, to subpart (c).

**OCA/USPS-252 and 253 (partial objection)**

These interrogatories deal with NetPost™ Certified Mail. OCA/USPS-252 asks a lengthy list of questions dealing with the operations, finances and legal

status of the service. Many of the interrogatory subparts are objectionable as they request information that is not relevant to this docket. NetPost™ Certified Mail is provided through the services of a contractor, who enters mail in full conformity with the DMCS. Also, some of the subparts are objectionable because they call for legal conclusions. The Postal Service will provide a description of the service as well as the Postal Service's operating expenses and revenues and operating income/loss up through the most recent quarter. The Postal Service will not provide any similar financial information from its contractor, nor will it provide anything further in response to other interrogatory subparts.

OCA/USPS-253 asks more questions concerning what NetPost™ Certified Mail is offered in connection with (subparts (a) and (b)), and what it is "ancillary" to and what is "ancillary" to it (subparts (c) through (f)). These questions are objectionable as calling for legal conclusions, and also because they are not relevant to this docket. The Postal Service will respond, however, by referring back to the description of the service that will be provided in response to OCA/USPS-252 as that response may partially and indirectly address some of the issues raised in OCA/USPS-253.

**OCA/USPS-268-285 and 290 (full objection)**

These interrogatories ask a series of extremely specific questions concerning the Confirm® program and Planet Codes. OCA inquires, among other things, about the target mail user population, operating costs, volumes, statements made by Postal Service managers concerning Confirm®,

performance data, percentages of various types of mail processed on equipment that can read Planet Codes, and future Postal Service plans concerning combining Planet Codes with other products or services. The Postal Service objects to providing any information whatsoever in response to any of these questions.

First, the requested information is not relevant to this proceeding. Confirm® is not at issue in this case. In fact, the Postal Service currently has plans to bring a future request to the Commission to establish a classification and fees for Confirm®. Whatever costs the program has and will incur until that time are and will be covered by respective CRAs, as with any product under development. Moreover, because the Postal Service is planning to bring a case to the Commission, the requested information is pre-decisional, prepared in anticipation of litigation, and is protected under the attorney-client, attorney work product and deliberative process privileges. The questions posed by OCA go to the very heart of the case that the Postal Service has been preparing. It would be the height of unfairness, not to mention a violation of the Postal Service's due process rights, to force it to give OCA and others a "sneak preview" of its case. This would certainly have a serious chilling effect on the Postal Service's ability and willingness to bring new products to the Commission, to the detriment of the Postal Service and of all mail users, including those members of the general public whom OCA is authorized to represent.

**Conclusion**

The OCA's fishing expeditions on topics unrelated to the present litigation do not serve the ratemaking process. The drain on resources they already and potentially represent threaten the ability of all to give full and fair airing to the pertinent, legitimate issues in this case. Accordingly, for the reasons outlined above, the Postal Service believes that it should not have to provide responses to the OCA interrogatories, beyond those discussed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Susan M. Duchek

**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.

  
\_\_\_\_\_  
Susan M. Duchek

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December 3, 2001

Why doesn't the Postal Service offer the same service for Priority Mail?

OCA/USPS-230. Please refer to the response to OCA/USPS-83.

- (a) How can the mailer be assured that the mail piece was in fact delivered to the correct address?
- (b) How can the addressee establish that a mail piece with Delivery Confirmation has been delivered to the wrong address in such instances when that occurs?

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OCA/USPS-231. A member of the OCA staff recently telephoned 1-800-ASK-USPS for the purpose of comparing the advantages of mailing a lightweight item via Priority Mail versus First Class, from Durham, NC 27705 to Burtonsville, MD 20866. The representative at 1-800-ASK-USPS informed the OCA caller that Priority Mail would take two days for delivery, but the representative would not state how long it would take for First-Class delivery of the piece. The ASK-USPS representative would only state that First Class takes "between one and three days" and refused to offer more specific delivery information. When the OCA caller indicated that First Class might serve her needs about as well as Priority Mail, the ASK-USPS representative warned that: "First Class can take up to 30 days to be delivered." The ASK-USPS representative also stated that Priority Mail had an advantage over First Class because "Priority Mail travels on the same transportation as Express Mail."

- (a) Is it Postal Service policy to refuse to inform a mailer (or potential mailer) about the delivery times for First-Class Mail? Please explain fully.
- (b) Does the Postal Service withhold First-Class delivery times from representatives who answer calls at 1-800-ASK-USPS? Please explain fully.

- (c) What is the basis for the ASK-USPS representative's statement that "First Class can take up to 30 days to be delivered?"
- (d) Please confirm that the statement "First Class can take up to 30 days to be delivered" is a misleading statement apparently made to pressure a potential customer to choose Priority Mail over First Class.
- (e) Is the statement "Priority Mail travels on the same transportation as Express Mail" an entirely accurate statement? If not, why would the ASK-USPS representative make such a statement?
- (f) Please specify all instances in which a Priority Mail piece "travels on the same transportation as Express Mail" for each leg of transportation.
- (g) Please specify any instances in which a Priority Mail piece does not "travel on the same transportation as Express Mail."
- (h) If there are instances in which Priority Mail does not "travel on the same transportation as Express Mail," then confirm that the ASK-USPS representative made a misleading statement seemingly for the purpose of pressuring a potential customer to choose Priority Mail over First Class.
- (i) Please give an estimate of the Priority Mail volume that travels on the "same transportation as Express Mail."
- (j) Please give an estimate of the Priority Mail volume that travels on different transportation than Express Mail.
- (k) If there is insufficient space in any part of the Express Mail transportation network to carry all of the Express Mail volume and all of the Priority Mail volume ready to be loaded onto a vehicle, airplane, train, etc., then is all Express Mail loaded



ahead of the available Priority Mail? What steps are then taken to transport the remaining Priority Mail?

- (l) Please provide copies of any Postal Service policy statements, bulletins, scripts, memoranda, directives, training material, or any other type of written statement or document transmitted from any level of the Postal Service to another (or within any level) reflecting a policy to encourage customers or potential customers to choose Priority Mail over First Class. In addition to any written material, provide such material if the medium used to convey the message is electronic, via computer screen display, internet, in audio, or in video form.
- (m) Please provide copies of any Postal Service policy statements, bulletins, scripts, memoranda, directives, training material, or any other type of written statement or document transmitted from any level of the Postal Service to another (or within any level) that the ASK-USPS representative might have referred to or been aware of as a basis for refusing to state specific First-Class delivery times. In addition to any written material, provide such material if the medium used to convey the message is electronic, via computer screen display, internet, in audio, or in video form.
- (n) Please provide copies of any Postal Service policy statements, bulletins, scripts, memoranda, directives, training materials, or any other type of written statement or document transmitted from any level of the Postal Service to another (or within any level) that the ASK-USPS representative might have relied on, referred to, or been aware of as a basis for stating that Priority Mail travels on the same transportation as Express Mail. In addition to any written material, provide such

material if the medium used to convey the message is electronic, via computer screen display, internet, in audio, or in video form.

- (o) Please provide copies of any Postal Service policy statements, bulletins, scripts, memoranda, directives, training materials, or any other type of written statement or document transmitted from any level of the Postal Service to another (or within any level) that the ASK-USPS representative might have relied on, referred to, or been aware of as a basis for stating that First Class can take up to 30 days to be delivered. In addition to any written material, provide such material if the medium used to convey the message is electronic, via computer screen display, internet, in audio, or in video form.
- (p) Does Priority Mail always receive the "same" processing as Express Mail?
  - (h) If so, explain all such instances when this occurs.
  - (ii) If not, then explain all such instances when Priority Mail is processed differently from Express Mail.
  - (iii) Please give an estimate of Priority Mail volume that is processed the "same" as Express Mail.
  - (iv) Please give an estimate of Priority Mail volume that is processed differently than Express Mail.
  - (v) Assuming that Priority Mail is generally processed differently than Express Mail, then why wasn't the ASK-USPS representative instructed to give a more complete picture of the type of service a mailer can expect when choosing Priority Mail?
- (q) Is Priority Mail always delivered in the "same" manner as Express Mail?

- (i) If so, explain all such instances when this occurs.
- (ii) If not, then explain all such instances when Priority Mail is delivered in a different manner than Express Mail.
- (iii) Please give an estimate of Priority Mail volume that is delivered the "same" as Express Mail.
- (iv) Please give an estimate of Priority Mail volume that is delivered in a different manner than Express Mail.
- (v) Assuming that Priority Mail is often delivered in a different manner than Express Mail, then why wasn't the ASK-USPS representative instructed to give a more complete picture of the type of service a mailer can expect when choosing Priority Mail?

X

OCA/USPS-232.

A member of the OCA staff recently telephoned 1-800-ASK-USPS for the purpose of comparing the advantages of mailing a one-ounce letter via Priority Mail, Express Mail, or First Class from Arlington, VA 22207 to Chantilly, VA 20151. The OCA staff member ASK-USPS representative how long it would take for such a letter to reach its destination. The ASK-USPS representative said that it would take an "estimated day" to get there if it were mailed First-Class and would cost \$0.34. It would take an "estimated day" if it were mailed Priority Mail and would cost \$3.50, and, it would take 1 day if it were mailed Express Mail and would cost \$12.45 for guaranteed overnight delivery. The ASK-USPS representative stated that it would be better to send the letter via Priority Mail, if the customer wanted the letter to get delivered the next day. When queried about why the customer would want to pay an additional \$3.16 for Priority Mail, the representative said that Priority Mail was more likely to get there the next day

than was First-Class Mail. Further, the customer was told that Priority Mail gets transported via the Express Mail network.

- (a) When a customer makes an inquiry such as described in this interrogatory, what information is available to the 1-800-ASK-USPS telephone representative to assist in responding to the customer's query? Please provide a copy of all materials available to the ASK-USPS representative. If the information is available on a computer screen display, please provide a copy of all screen displays used to respond to such an inquiry.
- (b) Please explain how a Priority Mail piece going from ZIP-Code 222XX to ZIP-Code 201XX would be transported via the Express Mail network.
- (c) Please confirm that for locations that are fairly close together -- such as Arlington, VA and Chantilly, VA; Washington, D.C. to Baltimore, MD; Baltimore, MD to Wilmington, DE -- Priority Mail would be transported differently than Express Mail. Please explain in detail the transportation for these nearby city pairs, comparing Priority Mail to Express Mail.
- (d) Please explain the basis for the statement by the ASK-USPS representative that it would be better to send the letter via Priority Mail, if the customer wanted the letter to get delivered the next day. For letters mailed from Arlington, VA to Chantilly, VA, what percentage of First-Class letters are delivered overnight? For letters mailed from Arlington, VA to Chantilly, VA, what percentage of Priority Mail is delivered overnight?
- (e) What is the current First-Class single-piece letter service standard for a mail piece sent from ZIP-Code 222xx to ZIP-Code 201xx?

- (f) For the current period, what is the average delivery time for a First-Class letter going from ZIP-Code 222xx to ZIP-Code 201xx?
- (g) What is the current Priority Mail letter service standard for a mail piece sent from ZIP-Code 222xx to ZIP-Code 201xx?
- (h) What is the current average delivery time for a Priority Mail letter going from ZIP-Code 222xx to ZIP-Code 201xx?

\* OCA/USPS-233.

A member of the OCA staff recently telephoned 1-800-ASK-USPS for the purpose of comparing the advantages of mailing a one-ounce letter via Priority Mail, Express Mail, or First Class from Orlando, FL 32830 to Chantilly, VA 20151. The ASK-USPS representative stated that Priority Mail is transported via the Express Mail network.

- (a) When a customer poses a query such as described in this interrogatory, what information is available to the 1-800-ASK-USPS telephone representative to assist in responding to the customer's query? Please provide a copy of all materials available to the ASK-USPS representative. If the information is available on a computer screen display, please provide a copy of all screen displays used to respond to such an inquiry.
- (b) Please explain how a Priority Mail piece going from ZIP-Code 328XX to ZIP-Code 201XX would be transported via the Express Mail network.
- (c) What is the current First-Class single-piece letter service standard for a mail piece sent from ZIP-Code 328xx to ZIP-Code 201xx?
- (d) For the current period, what is the average delivery time for a First-Class letter going from ZIP-Code 328xx to ZIP-Code 201xx?

- (e) What is the current Priority Mail letter service standard for a mail piece sent from ZIP-Code 328xx to ZIP-Code 201xx?
- (f) What is the current average delivery time for a Priority Mail letter going from ZIP-Code 328xx to ZIP-Code 201xx?

OCA/USPS-234. For FY 2000 and FY 2001 and for each day of the week, i.e., Monday – Saturday, please provide the following Priority Mail 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 exact value, please provide an estimate.

- (a) The total volume and revenue generated by each day of the week, i.e., Monday through Saturday, in FY 2000. The information may be provided in a format similar to that used in OCA/USPS-30.
- (b) For each day of sales identified in response to (a), please provide the total volume of Priority Mail for which the delivery service standard was not met. The information may be provided in a format similar to that used in OCA/USPS-30.
- (c) For each day of sales identified in response to (a), please provide the total revenue of Priority Mail for which the delivery service standard was not met. The information may be provided in a format similar to that used in OCA/USPS-30.

OCA/USPS-235. The following interrogatory refers to the USPS response to OCA/USPS-24. For each of the Post Offices that do not receive daily deliveries of Express Mail, please indicate the following: (a) the time(s) mail is delivered to the Post Offices, and (b) the time(s) mail is picked-up from the Post Offices.

- (g) What corrective actions are being taken to ensure that PS Form 3811 is being filled out properly and completely by the addressee and returned to the USPS representative at the time of delivery?

X OCA/USPS-239. Please refer to Tr. 46C/20911, Docket No. R2000-1. In response to interrogatory OCA/USPS-142, Operating Revenue, Operating Expenses, and Operating Income/Loss figures were given for Post ECS and Electronic Postmark.

- (a) Please state whether any of these figures has been corrected or revised since they were first reported in response to OCA's interrogatory. If so, supply all corrections and/or revisions.
- (b) Also, please bring these figures up to date (through the current Accounting Period). (Break out specific Fiscal Years and current APs).
- (c) Please add a column equivalent to that set forth in Table 1, Tr. 21/9210 (Docket No. R2000-1) giving Total Operating Revenue, Total Operating Expenses, and Total Operating Income/Loss "Since Inception" through the current AP.

X OCA/USPS-240. Please refer to Tr. 21/9210, Docket No. R2000-1. In response to interrogatory OCA/USPS-122, Operating Revenue, Operating Expenses, and Operating Income/Loss were given for FirstClass Phone Cards, Retail Merchandise, PostOffice Online, Liberty Cash, Dinero Seguro, REMITCO, and Sure Money.

- (a) Please state whether any of these figures has been corrected or revised since they were first reported in response to OCA's interrogatory. If so, supply all corrections and/or revisions.

- (b) Also, please bring these figures up to date (through the current Accounting Period). (Break out specific Fiscal Years and current APs).
- (c) Include Total Operating Revenue, Total Operating Expenses, and Total Income/Loss Since Inception through the current AP.

\* OCA/USPS-241. At < <http://www.usps.com/paymentservices/>>, one of the online payment services offered is USPS eBillPay™ for Consumers.

- (a) What was the date of inception for this service?
- (b) 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.
- (c) Is First-Class Mail ever used to pay bills on behalf of consumers?
- (d) If so, in what percentage of instances are bills paid by mail?
- (e) In what percentage of instances are bills paid by electronic funds transfer?
- (f) Are bills ever presented by means of First-Class Mail?
- (g) If so, in what percentage of instances are bills presented by mail?
- (h) In what percentage of instances are bills presented in electronic form? What form does such presentation take?
- (i) Please provide, by fiscal year, since inception, the revenues generated on behalf of the Postal Service by USPS eBillPay™ for Consumers. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- (j) For each fiscal year since inception, please state the revenue per bill payment generated by USPS eBillPay™ for Consumers. For FY2002, please provide this



information by AP. Please state the source for all information provided in response to this question.

- (k) Please provide, by fiscal year, since inception, the operating costs incurred by the Postal Service in providing USPS eBillPay™ for Consumers. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- (l) What are the total start-up costs since inception for USPS eBillPay™ for Consumers?
- (m) Are the rates charged to consumers for USPS eBillPay™ for Consumers set at a level high enough so that start-up costs for USPS eBillPay™ for Consumers 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 eBillPay™ for Consumers being funded? Please state the source for all information provided in response to this question.
- (n) Are the rates charged to consumers for USPS eBillPay™ for Consumers high enough to recover the operating costs of USPS eBillPay™ for Consumers? 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.
- (o) For each fiscal year since inception, please state the operating cost per bill payment generated by USPS eBillPay™ for Consumers. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.

- (p) For each fiscal year since inception, please state the total cost per bill payment generated by USPS eBillPay™ for Consumers. (For purposes of this question, total cost is defined as operating cost plus start-up cost). For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- (q) In total, since inception, please provide the net surplus/loss generated by USPS eBillPay™ for Consumers. 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-242. If First-Class Mail is involved in the operation of USPS eBillPay™ for Consumers, 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?
- (a) Is USPS eBillPay™ for Consumers a service ancillary to the provision of First Class? Please explain.
- (b) Is First Class a service ancillary to USPS eBillPay™ for Consumers? Please explain.

- \* OCA/USPS-243. At < <http://www.usps.com/paymentservices/demo/welcome.htm>>, the statement is made, with respect to USPS eBillPay™: "The service is safe, fast, backed by the United States Postal Service.®" Please explain how the Postal Service "backs" USPS eBillPay™.

- (a) Does the Postal Service reimburse a consumer if late charges are incurred because of a late bill payment and USPS eBillPay™ is at fault? Please explain fully.
- (b) Does the Postal Service reimburse a consumer if fraudulent charges are made against a consumer's account and USPS eBillPay™ is at fault? Please explain fully.
- (c) Are charges such as those described in parts (a) and (b) treated as Postal Service operating costs in the offering of USPS eBillPay™? Please explain fully.

\* OCA/USPS-244. At < <http://www.usps.com/paymentsservices/>>, one of the online payment services offered is USPS Send Money.

- (a) What was the date of inception for this service?
- (b) 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.
- (c) Please provide, by fiscal year, since inception, the revenues generated on behalf of the Postal Service by USPS Send Money. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- (d) Please provide, by fiscal year, since inception, the operating costs incurred by the Postal Service in providing USPS Send Money. For FY2002, please provide this information by AP. Please state the source for all information provided in response to this question.
- (e) What are the total start-up costs since inception for USPS Send Money for Consumers?

- (f) Are the rates charged to customers for USPS Send Money set at a level high enough so that start-up costs for USPS Send Money 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 Send Money being funded? Please state the source for all information provided in response to this question.
- (g) Are the rates charged to consumers for USPS Send Money high enough to recover the operating costs of USPS Send Money? 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.
- (h) In total, since inception, please provide the net surplus/loss generated by USPS Send Money. 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-245. At < <http://www.usps.com/paymentservices/demo/welcome.htm>>, the statement is made, with respect to USPS Send Money: "The service is safe, fast, backed by the United States Postal Service.®" Please explain how the Postal Service "backs" USPS Send Money.

- (a) Does the Postal Service reimburse a consumer if late charges are incurred because of a late bill payment and USPS Send Money is at fault? Please explain fully.

- (b) Does the Postal Service reimburse a consumer if fraudulent charges are made against a consumer's account and USPS Send Money is at fault? Please explain fully.
- (c) Are charges such as those described in parts (a) and (b) treated as Postal Service operating costs in the offering of USPS Send Money? Please explain fully.

\* OCA/USPS-246. Why hasn't the Postal Service come to the Postal Rate Commission for a recommended decision on a classification and rate for USPS Send Money?

\* OCA/USPS-247. The OCA received a call recently from a Post Office Box customer in Stanton, Nebraska 68779. He complained that the fees for his size 2 box had approximately doubled since late 1998 (calendar year), and had gone up another 33 percent following the implementation of the R2000-1 fee schedule. From his description, it appears that his rates went from \$6.50 in late 1998 (calendar year), to \$12 in January of 1999, and then to \$16 in January 2001. (It is likely that his Post Office Box was in Group II in Docket No. R94-1, in Group D in Docket No. R97-1, and in Group D6 in Docket No. R2000-1). Understandably, he was baffled about the reason that his Post Office Box fees had increased many times the level of inflation. Using his complaint as an example of trends in Post Office Box costs and fees over the last three – five years, why have fees increased so sharply for a size 2 PO Box in an area like Stanton, NE? Please explain fully how rising costs, PO Box cost methodology, and fee design have caused such dramatic fee increases in the fee group(s) cited above.

\* QCA/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.

- (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.