

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS -4, 5(a), and 6
(December 4, 2001)

The United States Postal Service hereby objects to DBP/USPS-4, 5(a), and 6, filed on November 26, 2001. The text of the questions is attached.

Each of these questions is not discernibly different from questions (DPB/USPS-19, 20(a), and 21) posed by Mr. Popkin in Docket No. R2000-1, to which the Postal Service objected, and regarding which the Presiding Officer denied Mr. Popkin's subsequent motion to compel. (The sole known exception is DBP/USPS-4, which differs from DBP/USPS-19 in the last case only by virtue of the fact the Mr. Popkin has graciously deleted the previous subpart w, which had been a request for the Postal Service to confirm that "[c]ollection times shown as 12 PM should be changed to show Noon since 12 PM is actually midnight.") Therefore, the Postal Service objects to DBP/USPS-4, 5(a) and 6 in this proceeding on the same grounds upheld by the Presiding Officer's Ruling in the last case upholding its objections to DPB/USPS-19, 20(a), and 21, Presiding Officer's Ruling No. R2000-1/56 (May 2, 2000). Since the Presiding Officer in the same ruling in the last case partially granted Mr. Popkin's motion to compel DBP/USPS-20(b), the Postal Service will file a response to the corresponding question

in this case, DBP/USPS-5(b).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

CERTIFICATE OF SERVICE

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



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DBP/USPS-4 In order to determine the value to the customer for the ease and use of the collection system for First-Class Mail and other categories that may be mailed in collection boxes, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following as it applies to post offices that have city delivery service:

- a. Consistent with existing transportation, all collections should be made as late as possible.
- b. The specific requirements of the Postal Operations Manual must be complied with rather than a claim that collection times which do not meet these specific requirements are "consistent with the requirements of the local community" or reliance on another generalized claim.
- c. A collection box with a weekday 5 PM or later collection is required to be located at all post offices, branches, and stations.
- d. A collection box with a weekday 6:30 PM or later collection is required to be located all postal facilities that are in operation at that time.
- e. The Saturday collection is required at all 5 PM to 6:29 PM boxes at 1 PM or later and at all 6:30 PM or later boxes at 3 PM or later.
- f. All collections should be made as late as possible to meet the transportation. This applies to all collections on all days of the week. For example, if the transportation leaves a post office at 6:15 PM, the last collection in front of the post office should not be 5 PM but should be made some 15 to 20 minutes before the departure. This contemplates that the office is staffed and would not apply where the mail was picked up by a contractor from an "empty" post office.
- g. Residential collection boxes should be collected as late in the day as possible. While dedicated collection runs may be utilized, to have a letter carrier pass the box at a later time than shown on the collection box and not make the collection is not appropriate.
- h. Letter carriers should collect the residential collection box at the time that they return to the delivery unit if they pass the box or readily could pass the box on their return to the office. Carriers may collect boxes that are not on their route, if appropriate.
- i. The collection times should be staggered on collection routes so that the collection time shown on the label will be the latest possible time consistent with not being collected early. Residential boxes should be collected no earlier than 20 minutes prior to the collection. Time decal boxes should be staggered perhaps in even 5 or 10 minute intervals, particularly on the final collection of the day. Having all of the 5 PM boxes marked at 5 PM [when the actual collection time might be as late as 6 PM] is inappropriate. Likewise, having all of the residential boxes marked at the time that the letter carrier leaves the office is also inappropriate.
- j. In addition to the boxes at post office facilities, all boxes which develop an average of 100 pieces on a weekday must be collected at 5 PM or later. The 100-piece average is the sum of all collections made on a given day at all collocated boxes. Having multiple boxes at the same location as well as having multiple collections prior to 5 PM

is a reasonable likelihood that these boxes must be assumed to meet the 100-piece level.

- k. Within the city delivery area of a post office, a mailer should not have to travel more than one-half mile to a residential box and 2 miles to a time decal box.
- l. Saturday collections must be made from all collection boxes except those that may be in a locked building or facility and therefore not accessible by the collector. This includes boxes which are located in buildings that are accessible. The volume of mail developed on a Saturday does not eliminate the need for the collection.
- m. All collections which are shown on a collection box for a given day must result in the mail being dispatched on that day. This would mean that mail destined for the overnight area would be delivered on the following day, for the second day delivery area on the second day, etc.
- n. Collection boxes with Holiday collections should indicate what holidays it either applies to or does not apply to. This would not apply if collections are made on all holidays. Marking a box with a holiday collection time and then only collecting it on "minor" holidays is inappropriate.
- o. An accessible collection box must be located at all Processing and Distribution Centers that will be collected as late as possible. The earliest possible time would probably be just before the earliest possible time that the last mail arrives from the associated offices and completes the initial culling operation.
- p. All collocated boxes must be collected at all times that a collection is made from any of the boxes. If this would be service affecting, that should be noted on the collection label [for example, if the regular box was collected at 5 PM and 7 PM and the collocated Express Mail box was only collected at 5 PM because the 7 PM collection would not meet service standards, there should be a 7 PM collection made along with a remark that it may not meet service standards - otherwise a First-Class Mail letter mailed at 6 PM could be delivered prior to an Express Mail letter deposited at the same time]. An exemption to this might apply if an Express Mail box was being collected and transported directly to the Airport Mail Center without going through the P&DC.
- q. All mail which is collected by city delivery, rural, and HCR carriers must be dispatched to the P&DC on the day it was collected from the route and arrive at the P&DC to achieve the delivery standards related to the date the carrier collected the mail from the customer. This appears to be more of a problem on a Saturday. For example, if I were to give my letter carrier a letter on Saturday when he/she delivers mail to my house, that mail must be processed by the P&DC on Saturday for delivery on Monday or Tuesday. This would also mandate a later collection time on Saturday at the box located in front of the facility that the carriers operate out of since their mail is being dispatched anyway.
- r. Collection "box" labels or other appropriate signs should be posted on lobby drops inside of a postal facility.
- s. The collection times for the lobby drop located inside a postal facility and for the collection boxes located outside of the same facility should be the same times. This removes the confusion that would exist if they were different and it meets the requirement that both be as late as possible. The only exception would be that the lobby drop's last collection should be shown as the closing time of the lobby if that is

earlier than the outside time.

- t. Very clear signs should be required in those instances where window service is provided after the collection time for the final dispatch of the day.
- u. Time decals are required to be affixed on all boxes which have a 5 PM or later collection on a weekday.
- v. There are no restrictions about placing collection boxes in transportation terminals.

DBP/USPS-5 [a] Provide copies of any Headquarters directives that have been furnished to the field with respect to collection requirements in the past three years. [b] Please provide copies of any Inspection Service or OIG audits on collection service that have been conducted in the past three years.

DBP/USPS-6 Provide copies of any guidance that has been provided to District Managers with respect to the applicability of the requirements for collection boxes at non-city delivery offices.