

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MOELLER  
(UPS/USPS-T28-29, 30 AND 32)

The United States Postal Service hereby files its response to the following interrogatories of United Parcel Service redirected from witness Moeller and filed on November 19, 2001: UPS/USPS- T28-29, 30 and 32.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Scott L. Reiter

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December 6, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MOELLER**

**UPS/USPS-T28-29.** Confirm that there are no content restrictions that differ between non-letter Priority Mail and Parcel Post. If not confirmed, explain in detail.

(a) Identify and explain any Postal Service regulations that that would not permit a non-letter Priority Mail piece to be entered instead as a Parcel Post piece.

(b) Explain whether the Postal Service has taken into account in its Parcel Post DDU destination entry rate design the lost contribution that results from a Priority Mail piece being migrated to Parcel Post DDU-entry. If such lost contribution has not been taken into account, explain why not.

**RESPONSE:**

See response to UPS/USPS-T33-11 redirected to the Postal Service from witness Kiefer.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
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**UPS/USPS-T28-30.** Refer to the Mailer's Technical Advisory Committee Meeting Minutes for August 1-2, 2001 for "Issue 61 -- Service Assessment for DU Drop Shipments" under the category "Parcels" available at [www.ribbs.usps.gov/mtac.htm](http://www.ribbs.usps.gov/mtac.htm).

(a) Confirm that there is an ongoing measurement program to assess delivery performance for Parcel Post DDU destination entry parcels. If not confirmed, explain.

(b) Provide any available results from this program.

(c) Explain why "Priority Mail customers are invited to participate in the assessment."

(d) Is a Priority Mail DDU destination entry rate being considered by the Postal Service? If not, why not.

**RESPONSE:**

See response to UPS/USPS-T33-12 redirected to the Postal Service from witness

Kiefer.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
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REDIRECTED FROM WITNESS MOELLER**

**UPS/USPS-T28-32.** Describe in detail any differences in the handling and delivery of Standard Mail ECR DDU destination entry letters and First Class letters arriving at the DDU with respect to, but not limited to, priority in processing and delivery. Include in your explanation the effect of relevant statutes and Postal Service regulations on the ability of a mailer to migrate a First Class letter to a Standard Mail ECR DDU destination entry piece as well as the additional mail preparation (e.g., sequencing) that would be required of the mailer.

(a) Describe in detail the mail that could be sent as First Class mail but not as Standard Mail ECR DDU destination entry (due to statutes or Postal Service regulations concerning content restrictions).

**RESPONSE:**

The main driver in the difference in “handling and delivery” between ECR DDU letters and First-Class letters is the general preference given to First-Class Mail. A mailer’s “ability to migrate a First-Class letter to a Standard Mail ECR DDU” piece is constrained by DMM E110.1.6, which lists materials that must be mailed at First-Class or Express Mail rates. The requirements for mail entered at the ECR rates are in DMM E630. The specific requirement for sequencing is in E630.1.5. Destination Entry eligibility standards are in DMM E650.

a. See DMM E110.1.6 for examples of material that must be sent as First-Class Mail and, therefore, cannot be sent as ECR DDU.

## 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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Scott L. Reiter

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