

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBPUSPS-5, 15,17, 28, 32-36, 38-44, 46, 53-54, 56-57, 59, 62-66, 68-69, 71, 73-74,  
81)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBPUSPS-5, 15,17, 28, 32-36, 38-44, 46, 53-54, 56-57, 59, 62-66, 68-69, 71, 73-74, 81 filed on November 26, 2001. Objections to DBP/USPS-4-5(a), 6 were filed on December 4, 2001. Objections to the following interrogatories were filed on December 5, 2001: DBP/USPS-7-8; DBP/USPS-38 through 40 and 56(I&j); DBP/USPS-62(h) through (v). A partial objection to DBP/USPS-72, 76(B) was filed on December 6, 2001. Objections to DBP/USPS-9, 62(a)-(g) and 67 were filed on December 6, 2001. Response to DBP/USPS-10-14, 16, 18-27, 29, 37, 45, 47-52, 55, 60-61, 70, 75-80 and 82 are forthcoming.

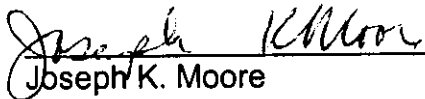
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Joseph K. Moore

December 10, 2001

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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.

**RESPONSE:**

- a.    Objection filed.
- b.    No such audits have been identified.

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**DBP/USPS-15**

[a] Confirm, or explain if you are unable to do so, that Express Mail will be delivered all 365/6 days a year.

[b] Confirm, or explain if you are unable to do so, that Express Mail may be addressed to any authorized type of address, including, but not limited to, city delivery street address, post office box, General Delivery, Rural Route / HCR Route in the RR 2 Box 123 format, and Rural Route / HCR Route in the city delivery type format [123 Main St].

**RESPONSE:**

a. Confirmed.

b. Confirmed.

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**DBP/USPS-17.** With respect to the delivery of Express Mail, do regulations or Headquarters directives mandate each of the following and/or discuss its applicability [please provide copies of the directives and/or citation of the regulation]:

- [a] Should delivery be made as early as convenient or is anytime prior to the guaranteed delivery time satisfactory?
- [b] Should city delivery carriers deviate from their routes to achieve delivery prior to the guaranteed delivery time?
- [c] Should rural/HCR carriers deviate from their routes to achieve delivery prior to the guaranteed time?

**RESPONSE:**

- a. Every attempt is made to ensure delivery is made as early as possible.
- b. Yes.
- c. Yes.

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**DBP/USPS-28** [a] How many of the mail processing facilities are now fully equipped with a device which will automatically "trap" a Certified Mail article by the presence of the phosphor ink on the Certified Mail label? [b] How many of the mail processing facilities are partially equipped with such a device? [c] How many of the mail processing facilities are not equipped with such a device? [d] What percentage of the mail is processed through a machine equipped with such a device. Note: Subparts a through c refer to the number of facilities and subpart d refers to the percentage of mail. [e] If there are any facilities listed in response to subparts b or c or if the response to subpart d is not 100%, provide an implementation schedule as to when that level will be achieved. [f] Confirm, or explain if you are unable to do so, that if there are any facilities which do not have such a device installed then there is an increase in the likelihood that the mailer may not receive the Certified Mail service that was requested. [g] If your response to subpart f is negative, then what purpose is achieved by installing these devices? [h] If you are able to confirm subpart f, explain how the failure to have all facilities equipped with this device can be reconciled with providing a quality service with value to the mailer.

**Response:**

(a-h) See testimony of witness Kingsley (USPS-T-39), page 8, lines 17-30.

(d) As of AP 12, FY 01, plants processed 81 percent of total incoming secondary letter volume in automated operations. See testimony of witness Kingsley, page 11, lines 18-21.

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**DBP/USPS-32.** The following interrogatories are related to determining how revenue and expenses which apparently are not related to matters under the jurisdiction of the Postal Rate Commission enter into the rate evaluation. [a] For example, how are any profits [revenue minus expense] from such items as *International Mail, Philatelic Products, Phone Cards, Money Cards, and sale of merchandise ranging from Fathers Day cards to Bug Bunny ties* taken into account? [b] Do any profits go into the total postal revenues thereby reducing the total amount that must be recovered from postage charges?

**RESPONSE:**

- (a) Please see the response to DBP/USPS-59(a), Tr. 21/8727, in Docket No. R2000-1.
- (b) Please see the response to DBP/USPS-59(b), Tr. 21/8727, in Docket No. R2000-1. *Please note that in the instant docket, the Postal Service's Compliance Statement, Attachment G states, "Considering all nonpostal services, eCommerce and non-eCommerce (but excluding those such as C.O.D., insurance and money orders already included in the exhibits of Ms. Meehan, etc.), the difference between costs and revenues of approximately \$21.5 million reduced the institutional costs borne by postal services by that amount in FY 2000."*

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**DBP/USPS-33.** [a] For each of the past five years, what were the total revenue and expenses for International Mail? [b] For each of the past five years, what were the total revenue and expenses for the sale of Phone Cards and Money Cards? [c] For each of the past five years, what were the total revenue and expenses for the sale of the various items of merchandise as noted above?

**RESPONSE:**

- (a) For each of the past five years, the total revenue and expense for International Mail can be found in the Cost and Revenue Analysis report. These reports are available in the Postal Service Library, L'Enfant Plaza, SW, Washington, D.C. 20260 or through either the Postal Rate Commission Docket Room or website.
- (b)-(c) In general, the Postal Service does not track revenue and expenses for the sale of the various items of merchandise as defined in the question. For those items that are separately tracked, though, some information can be found in USPS-LR-I-248, filed in Docket No. R2000-1. Some additional information will be furnished in this docket in response to OCA/USPS-240.

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**DBP/USPS-34.** With respect to Philatelic Products, [a] for each of the past ten years, what were the total revenue and expenses amounts related to it? [b] With respect to revenue amounts, what methods are utilized to determine the division of stamp sales between those that will be utilized to pay for mailing as opposed to those will not be utilized? [c] What are the goals of the Postal Service with respect to the profit levels to be achieved from the sale of Philatelic Products?

**RESPONSE:**

- (a) Philatelic programs include the sale of stamps to collectors and the sale of other philatelic products. Postal Service accounting reports do not provide sufficient information to precisely determine the revenues and expenses that result from philatelic programs. For example, revenue from sale of stamps is not separated in accounting records between the amount that is used for postage and the amount that is to be saved by collectors. Also, printing and window service labor costs related to philatelic stamp sales are not available from Postal Service accounting records and reports.
- (b) Stamp Services uses a sampling system called the Household Tracking Index to estimate the number of stamps that are purchased within each household, and out of this total how many are used for postage or saved by collectors. Each quarter, a self-administered questionnaire is mailed to a total of 10,000-15,000 households. Selected households are provided with visual replications of stamp issues, and asked specifically how many of each stamp issue they have retained or might retain for non-mailing purposes. On average, 7,000-8,000 households complete and return the questionnaire. Also, a random-digit dialing phone survey is conducted, making approximately 1,000 calls per week. Respondents are asked



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about the number of stamps purchased, how many they might use for postage, and how many they might retain for non-mailing purposes.

- (c) Please see the response to DBP/USPS-61(c), Tr. 21/8729, in Docket No. R2000-1.

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**DBP/USPS-35.** With respect to the delivery of Post Office to Addressee Express Mail,

[a] Provide information on the percentage of articles that are delivered by the guaranteed delivery time. Provide records for the past year or more.

[b] Confirm that only the mailer [and not the addressee] may make a postage refund claim for delivery made after the guaranteed time.

[c] How many articles and what percentage are delivered later than the guaranteed time over the past year or more?

[d] How many claims have been filed for return of postage for late delivery for the same time period as utilized in Subpart [c]?

[e] Confirm that a mailer must take a specific action to determine that an Express Mail article was delivered late and that without this information will be unaware of the late delivery of the article.

[f] Explain any reasons why the percentage of refunds is less than the total number of articles delivered late.

[g] Please explain and discuss any subparts you are not able to confirm.

**RESPONSE:**

a. See response to OCA/USPS-T35-4(j)(2) in this proceeding.

b., d. – g. See Docket No. R2000-1, Tr. 21/8730.

c. See response to OCA/USPS-T35-2(a) in this proceeding.

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DBP/USPS-36      Provide a breakdown by volume and revenue showing the percentage of Priority Mail [a] that is transported in each of the following categories:

- [1]      Direct [as opposed to a hub and spoke] surface transportation
- [2]      Direct air transportation
- [3]      Hub-to-spoke surface transportation
- [4]      Fedex Network
- [5]      Other Hub-to-spoke air transportation
- [6]      Other methods of transportation [Break out and identify any which have 5% or greater volume or revenue].

[b]      Provide a separate similar listing broken down by each of the separate zone rates, namely up to the 3<sup>rd</sup> zone, for the 4<sup>th</sup> zone, for the 5<sup>th</sup> zone, for the 6<sup>th</sup> zone, for the 7<sup>th</sup> zone, and for the 8<sup>th</sup> zone.

RESPONSE

(a)    (1)    The requested data are not available.

          (2)    The requested data are not available.

          (3)    The requested data are not available.

          (4)    For purposes of developing cost distributions, witness Hatfield estimated the volumes of Express, Priority, and First-Class Mail to be carried on the FedEx networks in FY 2002 and FY 2003. These volume estimates are contained in USPS-LR-J-94, Table 305, produced under protective conditions.

No revenue figure is available..

          (5)    The requested data are not available.

          (6)    The requested data are not available.

(b)    The requested data are not available.

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**DBP/USPS-38** In regard to the Service Commitments / performance goals for First-Class Mail, with regard to the delivery standards realignment that took place as a result of Docket N89-1 along with the experimental [which became permanent on September 23, 1989] realignment that took place prior to that in the Metropolitan New York City area, what percentage of the mail profile prior to that Docket and experiment shifted from [a] one-day to two-day delivery, [b] one-day to three-day delivery, [c] two-day to one-day delivery, [d] two-day to three-day delivery, [e] three-day to one-day delivery, and [f] three-day to two-day delivery? [g] What were the purposes of this realignment? [h] Did this realignment result in an increase in or a savings of costs associated with the mail processing and transportation [or any other areas]? [i] If so, provide the yearly change in costs for each year since the change. [j] Did this realignment result in a change in the consistency of mail delivery? [k] If so, provide the data for each year since the change. [l] Have there been any changes in delivery standards since this experiment/docket? [m] If so, enumerate them. [n] Is there a specific request to the mailing public at regular intervals to inquire about potential changes desired in delivery standards? [o] If so, explain and provide details. If not, explain why not.

**RESPONSE:**

All of these questions have been responded to by the Postal Service or addressed by the Commission in response to motion practice in the concurrent Docket No. C2001-3 proceeding. Please refer to the responses, pleadings and rulings in that proceeding. Please also consult the Commission's Rules of Practice and Procedure regarding how Docket No. C2001-3 responses that are relevant and necessary to a resolution of issues raised in Docket No. R2001-1 can be designated into the record of the latter proceeding.

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**DBP/USPS-39** With respect to the delivery standards / commitments for First-Class Mail, I am interested in obtaining the criteria that are utilized to determine whether a given path will be committed for overnight, 2-day, or 3-day delivery. [a] Confirm that for any given ZIP Code pair [other than the military ZIP Codes] will be committed for delivery in three days or less. [b] Provide copies of any directives and guidelines that are utilized to determine those areas that fall into and or all of those three categories. [c] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive overnight service. [d] Is the minimum area that is overnight an entire 3-digit ZIP Code prefix, namely, if A to B is overnight then it is also overnight to all facilities with the same 3-digit ZIP Code prefix as B? [e] If A to B is overnight, then will all offices that are served by the P&DC/P&DF serving B be overnight from A? [f] Must overnight service be reciprocal, namely if A to B is overnight, then B to A will also be overnight. [g] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive 2-day service. [h] Is the minimum area that is 2-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 2-day to all facilities with the same 3-digit ZIP Code prefix as B? [i] If A to B is 2-day, then will all offices that are served by the P&DC/P&DF serving B be 2-day from A? [j] If A to B is 2-day, then will all offices that are served by the ADC serving B be 2-day from A? [k] Must 2-day service be reciprocal, namely if A to B is 2-day, then B to A will also be 2-day. [l] Must all offices within a given state be overnight or 2-day from anywhere within the same state? [m] Must all adjacent ZIP Code areas be either overnight or 2-day service? In other words, any two neighbors may not have 3-day service between them. [n] Is the minimum area that is 3-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 3-day to all facilities with the same 3-digit ZIP Code prefix as B? [o] If A to B is 3-day, then will all offices that are served by the P&DC/P&DF serving B be 3-day from A? [p] If A to B is 3-day, then will all offices that are served by the ADC serving B be 3-day from A? [q] Must 3-day service be reciprocal, namely if A to B is 3-day, then B to A will also be 3-day. [r] Please indicate the guidelines that were utilized in Docket N89-1 along with any changes that have been implemented since then. In these guidelines, also indicate the minimum percentages of a facility's mail that would mandate a higher level of service. [s] Please discuss, explain, and provide appropriate data of any of the sub-parts d through q above that you are not able to provide an unqualified yes response.

**RESPONSE**

(a-r) All of these questions have been responded to by the Postal Service or addressed by the Commission in response to motion practice in the concurrent Docket No. C2001-3 proceeding. Please refer to the responses, pleadings and rulings in that proceeding. Please also consult the Commission's Rules of

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**RESPONSE to DBP/USPS-39 (continued):**

Practice and Procedure regarding how Docket No. C2001-3 responses that are relevant and necessary to a resolution of issues raised in Docket No. R2001-1 can be designated into the record of the latter proceeding.

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**DBP/USPS-40** [a] Confirm in general that air transportation will be more costly than surface transportation. [b] Confirm in general that air transportation will provide more expeditious service than surface transportation. [c] If not, explain. [d] Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part? [e] If not, why not and explain how the handling of this mail could be considered to be handled expeditiously. [f] Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service. [g] Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago. [h] Does the level to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service? [i] If not, explain how and why it does not.

**RESPONSE:**

- (a-f) All of these questions have been responded to by the Postal Service or addressed by the Commission in response to motion practice in the concurrent Docket No. C2001-3 proceeding. Please refer to the responses, pleadings and rulings in that proceeding. Please also consult the Commission's Rules of Practice and Procedure regarding how Docket No. C2001-3 responses that are relevant and necessary to a resolution of issues raised in Docket No. R2001-1 can be designated into the record of the latter proceeding. See also Docket No. R2000-1, Tr. 21/8736.
- (g) Objection filed.
- (h&i) The question is unclear. There is doubtless far more mail in the system, and more being flown than in the mid-1970's. Furthermore, the quality of air service differs depending on the type of service provided. In the 1970s, the Postal Service did not operate a Daynet, an Eagle network, a WNET, or a CNET. Nor did it have an agreement to fly mail with an

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**RESPONSE TO DBP/USPS-40 (continued):**

integrated transportation provider such as FedEx. Also, over the years, new service-responsive long-haul surface transportation has been available.



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**DBP/USPS-41** In regard to the Service Commitments / performance goals for First-Class Mail, [a] do the delivery standards apply to all types of First-Class Mail regardless of whether it is a letter, card, parcel, flat, or other shape or type? [b] Do the delivery standards apply regardless of the method by which the article is addressed such as printed vs. handwritten? [c] Do the delivery standards apply regardless of whether the article has no ZIP Code or a 5- or 9- digit ZIP Code? [d] Do the delivery standards apply regardless of whether or not the article contains a 5-, 9-, or 11-digit barcode applied by the mailer? [e] Do the delivery standards apply regardless of any other services that are utilized such as Certified Mail, Registered Mail, COD, Insured Mail? [f] Do the delivery standards apply whether or not the postage is paid by stamps which require cancellation or by some other means, such as a postage meter, which does not require cancellation. [g] Are the EXFC results broken out by any sub-scores for different characteristics of mail as noted in subparts a through f above? If so, provide results for the most recent period. [h] Elaborate and explain any negative answers.

**RESPONSE:**

(a-f) See Docket No. R2000-1, Tr. 21/8737.

(g) Yes. See the Docket No. R2001-1 response to UPS/USPS-T28-13.

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**DBP/USPS-42** [a] Is mail addressed to a government agency in Washington DC [ZIP Codes 202 through 205] included in the EXFC results for Washington DC? [b] If not, why not? [c] Have any studies been completed in the past three years to evaluate the delivery service to these agencies? If yes, please provide copies. If not, why not? [d] What special methods, if any, are utilized to process mail to these agencies. [e] Is the Postmaster at Washington responsible for the delivery of mail to these agencies? If not, please provide the name, title, and address of the responsible individual.

**RESPONSE:**

- (a-b) EXFC test mail pieces are addressed by PriceWaterhouseCoopers testers to other PWC testers. PWC does not employ government agencies as test mail recipients.
- (c) No, because resources have been devoted to other matters.
- (d) Mail addressed to government agencies is processed using the same personnel and equipment as other mail.
- (e) Notwithstanding the irrelevance of this question to ratemaking, the Postal Service can confirm that the Washington DC Postmaster is responsible for the delivery of all mail in the District of Columbia, including mail addressed to government agency offices in the District.

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DBP/USPS-43 [a] Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day? [b] Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day? [c] Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day? [d] Does this apply to all delivery dates including Saturday? [e] Explain and elaborate on any negative answers.

**RESPONSE:**

Please see the response to DBP/USPS-75 in Docket No. R2000-1, at Tr.

21/8379.

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**DBP/USPS-44.** With respect to Express Mail tracking,

[a] Indicate the points at which an Express mail article will be scanned, in the format of "acceptance to the mailing office", "arrival at the delivery office", etc.

Distinguish between those points that are required and those that are optional.

[b] How often and at what times are the results of the scan uploaded so that the information will be available to the public on the telephone or website? If necessary, provide separate information for different days of the week or otherwise.

**RESPONSE:**

See Docket No. R2000-1, Tr. 21/8746.

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**DBP/USPS-46**

- [a] Confirm that the reverse side of the Customer Copy of Label 11-B for Express Mail starts off with the words "Service Guarantee" and uses the words "guaranteed time" two times in the body of the first paragraph.
- [b] Confirm that the Postal Service utilizes the word, or a derivative of the word, "guarantee" in its publicity and advertising of Express Mail.
- [c] What is the definition of the word "guarantee/guaranteed", or its derivative, as utilized in these respects?
- [d] Confirm that the word "guarantee", or its derivatives, when utilized by the Postal Service with respect to Express Mail means that the mailer will be guaranteed to get a refund of postage if the article is not delivered by the *guaranteed time*, as opposed to whether or not it will even be possible for the delivery to be made.
- [e] What percentage of the Express Mail users in the country do you feel will believe that the use of the word guarantee, or its derivatives, will indicate that, barring a failure, delivery will be made by the *guaranteed time*?
- [f] Confirm that there are instances where a mailer of Express Mail will be provided a guaranteed delivery time at the time of mailing the article for which it will be impossible for the Postal Service to achieve.
- [g] Do you feel that this form of advertising is in the best interests of the customer? If so, please explain why?
- [h] If a private delivery service were to advertise delivery by a *guaranteed time* when it was impossible to achieve that delivery time, could that be considered false advertising?
- [i] Is the Postal Service exempt from complying with the Truth in Advertising laws of the Federal Trade Commission?
- [j] If not, what is their policy on voluntary compliance.
- [k] Please discuss and explain any items you are not able to confirm.

**RESPONSE:**

See Docket No. R2000-1, Tr. 21/8747.

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DBP/USPS-53      [a] Confirm, or discuss and explain if you are not able to confirm, that the Postal Service makes a business decision to not process a service in accordance with its own rules and advertisements to the public when there is a belief that it would cost more money to comply with the regulations than the penalty for not doing so. Some specific examples for which a specific individual response are: [b] Express Mail which will be impossible to achieve delivery by the guaranteed time will be accepted and the price of making the refund, if requested, is less than it would be to either fix the problem or increase the level of transportation/service. [c] Registered Mail which is handled as ordinary First-Class Mail as noted in the recent Inspection Service Area Coordination Audit Report on Special Services and the cost of paying a claim will be less than the cost to provide the proper handling of the mail. [d] Return Receipts which are completed by the addressee at a time after delivery without supervision of the Postal Service as mandated because it is easier for the Postal Service to complete them that way and save costs on the assumption that that the mailer will be unaware of the level of service, or non-service, that has been received [e] Insured Mail receives no special protection or handling enroute other than to have the addressee sign for it on the assumption that it is less expensive to pay the claims than to provide the service. [f] Normal collection times are not made as mandated in the POM because it is felt that it would cost too many hours to make the collections that are mandated in the POM and the belief that the mailing public will receive a satisfactory level of service even though it does not meet the requirements. [g] Same as subpart f except because it is felt that it would impact the arrival mail profile at the P&DC and would either require a capital expenditure for more equipment or a greater number of work hours than desired to process the mail for committed delivery standards. [h] Regularly scheduled collection times and retail window service hours are reduced or eliminated in the days on or surrounding holidays because it is believed that it will be possible to save hours while not inconveniencing the public. [i] If a collection box has a posted time on it, can the post office not make the collection by releasing a press story of the reduction to the news media - please limit your response to non-emergency conditions? [j] For each of the subparts above, explain whether the public would perceive the Postal Service's regulations, advertising, and/or claims to be valid, truthful, and/or meaningful with respect to the actual service being rendered as opposed to the service mandated, advertised, or claimed. [k] What action should a customer take when they observe or experience one of the conditions described above, or for that matter, have any concern or complaint regarding the operation of the United States Postal Service. [l] What action should a customer take when they are unable to receive a comprehensive response within 14 days as mandated by Section 165.1 of the POM? [m] If a customer initially contacts a local Postmaster to resolve a complaint or concern and does not receive a comprehensive response as noted above, please provide a complete listing of the job titles, as well as the order to be followed, which the customer should then contact, for example, District Manager, Area Vice President, etc.

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**RESPONSE:**

Please see the response to DBP/USPS-96 in Docket No. R2000-1, at Tr.

21/8759-60.

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**DBP/USPS-54** [a] Confirm, or explain and discuss if you are not able to confirm, that the EXFC program has accomplished the following three results, [1] It has allowed the Postal Service to find the root causes for many of the items which delay the mail and correct them so as to improve the service. [2] It has caused the Postal Service to engage in a high cost system for error correction. For example, before EXFC was in place, a post office receiving a quantity of mail for another office in error, just sent the mail back to the P&DC for delivery on the following day. Now the mail will be specially brought over to the other office so that it can be delivered on the scheduled day. and [3] It has caused post offices to come up with creative methods of manipulating the EXFC score such as a post office making collections before 5 PM at box locations that are mandated to be collected at 5 PM or later so as to achieve a better mail arrival profile at the P&DC and therefore improve the likelihood of a higher EXFC score. [b] Provide and explain any other benefits of the EXFC program.

**RESPONSE:**

EXFC provides an indication of the quality of First-Class Mail service originating from and destinating to participating performance clusters. It is a useful tool in helping postal managers to judge the nature of service being provided and to identify links in the network to be examined for the purpose of making corrections and improving service. EXFC is not designed to and does not have as its purpose the provision of guidance to managers regarding solutions to mail processing and delivery deficiencies. The existence of EXFC cannot be said to cause "manipulation" of EXFC scores any more than the existence of democratic voting procedures can be said to cause the "manipulation" of voting results.

See also, Docket No. R2000-1, Tr. 21/8761.



RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-56** [a] Confirm, or explain and discuss if you are not able to confirm, that EXFC is a measurement for First-Class Mail only. [b] Confirm, or explain and discuss if you are not able to confirm, that all EXFC test mail is prepaid at the single piece rate and is deposited in collection boxes. [c] Confirm, or explain and discuss if you are not able to confirm, that EXFC pieces are not sent by any of the presorted / automation rates. [d] Provide the results of any studies that have been made showing the extent to which the delivery times of presorted / automation rate First-Class Mail is achieved. [e] Provide the results of any studies that have been made which would allow the EXFC results to serve as a proxy for the automated / presorted mail. [f] Does the EXFC program check all types of First-Class Mail / by shape such as letter, flat, SPR etc., / by method of addressing such as printed, typewritten, or hand written / by method of postage prepayment such as stamped or metered? [g] What percentage of the country's total mail volume [of EXFC type of mail] is tested by the EXFC program? [h] Does the EXFC program make an effort to sample the origin-destination pairs, shape, method of addressing, and method of postage prepayment in proportion to the volume that exists within the entire universe? If not, why not. If so, provide copies of any study. If necessary, separate and discuss each separate criteria. [i] In the event that a post office wishes to eliminate collection from a collection box on a particular date and time, such as might occur on a holiday or a day surrounding a holiday, are they able to notify PriceWaterhouse in advance so that they will not deposit EXFC mail for that omitted collection time [even though the box is posted with that time]? [j] If the response to subpart i is yes, please provide a listing of all instances in which this was done in the past year.

**RESPONSE:**

- (a,c) Confirmed.
- (b) All the principal single-piece First-Class Mail entry modes are used.
- (d-e) None exists.
- (f) Yes.
- (g) Well under one percent.
- (h) No. Its purpose is to provide a measure the quality of service in and out of participating performance clusters. It is not the goal of the program to perfectly replicate the First-Class Mail stream.
- (i) Yes.
- (j) Objection filed.

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**DBP/USPS-57** [a] Confirm that both post cards and stamped cards may be mailed at the same 21-cent postage rate [proposed to be 23-cents]. [b] What is the average cost for acceptance, processing, and delivering a post card? [c] What is the average cost for acceptance, processing, and delivering a stamped card? [d] If separate data is not available, please explain why it is not collected. [e] Provide the existing and proposed cost coverage for the entire First-Class Mail card subclass and for the single-piece First-Class Mail card rates. [f] Confirm that, in general, the cost for handling post cards would be higher than for handling stamped cards. [g] Confirm that the following characteristics would tend to indicate that stamped cards would have a lower cost than post cards: they are more uniform in size, they are more likely to have a printed address, they normally utilize the entire front of the card for the address. [h] Confirm that the following characteristics would tend to indicate that post cards would have a higher cost than stamped cards: they vary in size [between the authorized limits], they tend to have a glossy surface - both on the front and particularly on the reverse side, they are more likely to be hand addressed, and the left side of the card is normally utilized for a message rather than an address. [i] Explain and discuss any subparts that you are not able to confirm.

**RESPONSE:**

(a) Confirmed.

(b&c) The In-Office Cost System does not have separate cost data for these card types.

(d) Because no need sufficient to warrant doing so has developed and resources are devoted to collecting other data.

(e) See Exhibits USPS28A and 28B.

(f) See the response to subparts (b) and (c).

(g&h) The Postal Service does not have separate data for these card types that permit the statement of any conclusions regarding the degree or impact of any such cost tendencies.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-59** Most of the rates charged by the Postal Service are weight related. In order to mail the article it may be necessary to affix various labels or other material to the article as well as affix stamps to cover the cost. Please advise whether the following items are included in the weight of the article in determining the proper postage [for example, a Return Receipt card weighs approximately 0.12 ounces]. [a] If I affix one to a 0.95 ounce letter do I pay the one ounce rate because of the original weight of the letter of 0.95 ounces or am I required to now pay the two ounce rate because of the new total weight of 1.07 ounces? [b] The postage stamp or stamps that are affixed to pay the postage. [c] A Certified Mail sticker. [d] A Delivery Confirmation sticker [e] An Insured Mail sticker [f] A Registered Mail sticker [g] An Express Mail address label [h] A C.O.D. Mail label [i] If your response to subparts c, d, e, g, and/or h is yes, am I permitted to remove the mailing receipt part prior to the weight being determined?

**RESPONSE:**

See Docket No. R2000-1, Tr. 21/8765.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
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**DBP/USPS-62**

- [a] Please elaborate on the types of exceptional transportation that might be instituted to achieve timely delivery of Express Mail.
- [b] Please provide copies of any written material which provides guidance for providing exceptional transportation.
- [c] Please provide details of the approximate number of times that each of the types of exceptional transportation was utilized in a recent period of time of one year or more and the approximate percentage of articles requiring such exceptional transportation to achieve delivery by the guaranteed time actually did receive it.
- [d] Please advise whether each of the following forms of achieving delivery by the guaranteed time would be considered to be the referred to exceptional transportation:
  - [1] A city delivery carrier going several blocks out of the way to achieve timely delivery such as might be necessary to achieve delivery by the guaranteed 12 noon at an address that normally did not receive delivery until perhaps 2 PM.
  - [2] Same as #1, except a rural or HCR carrier going many miles out of the way to achieve the same timely delivery.
  - [3] Providing delivery to a city delivery address on a non-delivery day such as a Sunday, Holiday, or other non-delivery date.
  - [4] Providing delivery to a rural or HCR address which utilizes an address in the format of 123 Main Street on a non-delivery day such as a Sunday, Holiday, or other non-delivery date.
  - [5] Providing delivery to a rural or HCR address which utilizes an address in the format of RD 2 Box 123 on a non-delivery day such as a Sunday, Holiday, or other non-delivery date.
  - [6] Transportation of the mail to a postal facility on a day when mail is not normally transported to the facility. This includes all 365 days of the year.
  - [7] Establish a means for delivering the article once the transportation referred to in #6 has been accomplished.
  - [8] Opening a postal facility to allow for delivery of mail addressed to a Post Office Box on any of the 365 days of the year.
  - [9] Same as #8 for mail addressed to General Delivery.

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**DBP/USPS-62 (CONTINUED)**

- [e] Please provide any other examples besides the nine items referred to in subpart d above.
- [f] To what extent will cost of providing this exceptional transportation enter into the decision to utilize the exceptional transportation to achieve delivery by the guaranteed delivery time?
- [g] Please provide copies of any directives which relate to the decision in subpart f above.
- [h] Confirm that there are places in Alaska having postal facilities where access may be achieved by air only.
- [i] Confirm that at locations noted in subpart h above some to all receive mail transportation less than seven days a week
- [j] Confirm that at locations noted in subpart h above some to all do not have scheduled air transportation seven days a week.
- [k] Confirm that at locations noted in subpart h would require a special unscheduled trip to achieve access all 365 days a year.
- [l] Provide some indication of the cost of making an unscheduled trip to a remote location in Alaska.
- [m] Provide an indication of the number of postal facilities in Alaska that have scheduled mail transportation to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week.
- [n] Provide an indication of the number of communities in Alaska having postal facilities that have scheduled air service to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week.
- [o] Provide an indication of the number of communities in Alaska to which unscheduled air service is available to them seven days a week, six days a week, five days a week, four days a week, three days a week, two days a week, one day a week, and less than one day a week.
- [p] Please explain the method by which the mail would be handled on either a scheduled or unscheduled air trip in Alaska [that was not a scheduled mail trip] with respect to the custody of the mail and the transfer of it to the Postal Service at the delivery point.

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**DBP/USPS-62 (CONTINUED)**

- [q] Are there existing agreements with air carriers to provide transportation of the mail on either a scheduled air trip [but not a normal mail trip] or on an unscheduled trip to an Alaska delivery point.
- [r] Please provide copies of such agreements.
- [s] What percentage of the Alaska points that are accessible by air only have such an agreement?
- [t] Confirm that there are places in Alaska having postal facilities where access may be achieved by water only or in addition to air.
- [u] Please provide the data requested in subparts i through s for those facilities noted in subpart t above.
- [v] Please provide an indication of the extent to which weather and/or other factors in Alaska will prevent scheduled mail trips from taking place as planned.

**RESPONSE:**

Objection filed.

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**DBP/USPS-63.** Please confirm that customers receiving an indication of a guaranteed delivery time for Express Mail could, in some to all instances, have an expectation that delivery would be accomplished by that time regardless of how isolated the destination might be.

**RESPONSE:**

Confirmed.

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**DBP/USPS-64** Please refer to the response to POIR4/14 for the definition of a P&DC. Please clarify the conditions as to which a P&DC will dispatch mail to other P&DCs as opposed to ADCs.

**Response:**

As stated in POIR4/14, P&DCs are actual physical facilities while ADCs concern sort plans, networks and mail flows as per the labeling lists in the DMM. Each P&DC is required to dispatch mail in accordance with the national labeling list designated for each class of mail. (For barcoded letters, the labeling list is called an AADC list.) Therefore, a P&DC can also be an ADC, AADC and/or SCF node of the network. However, exceptions are made on a local and Area bases for service reasons or because the volume of mail to a specific P&DC, not on the ADC list, is sufficient and economical to bypass ADC processing.



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**DBP/USPS-65.** Please refer to the response to OCA/USPS-27.

[a] Please confirm, or explain if you are unable to do so, that with the exception of the 20 facilities that have been listed in the response, all of the remaining facilities in the United States to which Express Mail may be sent [as noted in response to DBP/USPS-11] will receive Express Mail shipments 365/6 days a year.

[b] Will the shipment arrive at the facility in time to allow for delivery at all authorized addresses within the delivery area of that facility by the 12 noon or 3 PM scheduled delivery time? If not, provide a listing of any exceptions.

[c] Does transportation exist which will allow all of these facilities to receive the mail in time for delivery not later than the second day after mailing at any facility in the United States from which Express Mail may be sent [as noted in response to DBP/USPS-10]. If not, provide a listing of any exceptions.

[d] With respect to the listing of 20 facilities, please advise the days of the week and the time of the day that each of the facilities sends and receives shipments of Express Mail. Are shipments made on some or all of the legal holidays [provide details if needed to fully explain].

**RESPONSE:**

a. Confirmed.

b. Presumably yes.

c. Presumably yes.

d. Express Mail is delivered to Angle Inlet Monday, Wednesday, and Friday on HCR route 56711 from Warroad, arriving at 1100 and leaving at 1330. Oak Island, a CPO, is served on the same HCR, arriving and dispatching at 11:55, according to the contract. For the 18 remaining Post Offices, see attachment.

			TIME MAIL
	ZIP	FREQUENCY	ARRIVES/DEPARTS
<u>DESTINATION</u>	<u>CODE</u>	<u>OF FLIGHT</u>	<u>POST OFFICE</u>
Chicken	99732	Tuesday/Thursday	1235pm
Chignik	99564	Tue/Wed/Thu	1230pm
		Daily	1350pm
Chignik Lagoon	99565	Tue/Wed/Thu	1300pm
		Daily	1330pm
Chitina	99566	X7	1200pm
Eagle	99738	X67	1010am
False Pass	99583	Tue/Thu/Sat	1730pm
Hyder	99923	Mon/Thu	1215pm
King Cove	99612	Daily	1720pm
Lake Minchumina	99757	Mon/Wed/Fri	0930am
		Tue/Thu	1200pm
Minto	99758	Mon/Wed/Fri	1210pm
Nikolski	99638	Mon/Thu	1530pm
Nondalton	99640	Mon/Wed/Fri	1100am
Perryville	99648	Tue/Wed/Thu	1510pm
		Mon/Wed/Fri	1430pm
Point Baker	99927	X67	1200pm
		X7	1200pm
Port Alsworth	99653	Mon/Wed/Fri	1125am
Seldovia	99663	Mon/Tue/Wed/Fri	1210pm
		Tue/Thu	1215pm
Skwentna	99667	X67	1200pm
Tyonek	99682	X67	1040am
		X67 - daily except	
		Saturday/Sunday	
		X7 - daily except	
		Sunday	

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**DBP/USPS-66** [a] Please provide the definition of a parcel, including dimensions as appropriate, to allow for the use of Delivery or Signature Confirmation services for First-Class Mail and Package Services. [b] Confirm, or explain if you are unable to do so, that Delivery or Signature Confirmation services may be used with Priority Mail regardless of the shape of the article. [c] What are the reasons for the shape distinction between the availability of these services between Priority Mail and the other two services?

**Response:**

(a) See response to AMZ/USPS-T36-1d.

(b) Confirmed

(c) See responses to AMZ/USPS-T36-4a, e, 6b, and 8c and d.

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**DBP/USPS-68** [a] With respect to the Automation and Presorted Rates for Standard Mail, please confirm, or explain if you are unable to do so, that there are three separate rates depending on whether I mail them at a post office, or at a destination BMC, or a destination SCF. [b] Using the proposed nonprofit presorted rates for letters weighing 3.3 ounces or less, please confirm, or explain if you are unable to do so, that if I have 1000 pieces of mail all going to Englewood, NJ 07631 and I bring them into the Englewood Post Office, I will pay \$153. If I bring them all to the local BMC, I will pay \$132 and if I bring them all to the SCF at Hackensack NJ, I will pay \$127. [c] Please explain why I can save \$21 if I bring the mail to the BMC and \$26 if I bring the mail to Hackensack only to have the Postal Service transport all of the mail back to Englewood for delivery. [d] Why doesn't a lower rate exist for mail deposited at the destination office?

**Response:**

- (a) Though there would be three separate total postage costs, the rates would not differ. Discounts are available based on the facilities into which customers deposit their bulk mailings. For Automation and Presorted Rates in Standard Mail, there are two distinct destination entry discounts, DBMC and DSCF.
- (b) Not confirmed. The question does not specify whether the letters are machinable; see also response to (d). Assuming (1) the pieces are prepared in accordance with the criteria spelled out in the M Module of the DMM, (2) deposited in accordance with the criteria spelled out in the E Module of the DMM for presorted rates, and (3) the pieces are not subject to the nonmachinable surcharge for letters, this can be confirmed.
- (c) The mail in this example likely cannot be directly transported to Englewood. It likely must first receive processing at the Hackensack SCF where the pieces would be sorted from the 3 and/or 5-digit level to the carrier-route

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and/or DPS level. Consequently, the destination entry discounts for automation and presorted rate mail are based, in large part, on the destination entry point in relation to the processing location. So, in this example, the largest discount is offered when mail is entered at the SCF. A smaller discount is offered for entry into the destination BMC, which has direct transportation to the SCF.

- (d) If the mail in this example was entered at the Englewood post office, it would be necessary to back haul the mail to the Hackensack SCF for processing. In order to ensure that the mail does not bypass efficient automated processing at the SCF, the discounts have been established as to not encourage entry of mail below the processing facility. However, if the carrier-route processing occurred at the Englewood post office using, for example, 5-digit flats, the pieces entered at this office can be eligible for the DSCF discount. Also, ECR volumes sorted to carrier route are eligible for DDU rates since further processing at the SCF is not necessary.

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**DBP/USPS-69.** Please refer to the response to Interrogatory OCA/USPS-117 subpart d. Please confirm, or explain if you are unable to do so, that if delivery is made to a post office box at a time that the box is not accessible to the boxholder, then that will not qualify as a timely delivery.

**RESPONSE:**

Not confirmed.

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**DBP/USPS-71.** With respect to the proposed changes to the DMCS that the Postal Service is proposing with respect to obtaining refunds in the event of Express Mail not being delivered by the guaranteed delivery time,

[a] Please provide the wording that will be utilized on the revised Mailing Label.

[b] Please provide the wording that will be utilized in the changes to the Domestic Mail Manual.

[c] Because a LITERAL reading of the overly broad wording of the exclusions for not having to pay refunds could be utilized if the proposed DMCS change is approved, what assurances will mailers have that refunds will still continue to be paid on a reasonable basis?

[d] Approximately what percentage of the Express Mail refunds that were actually paid in a recent period of at least one year and prior to September 11, 2001 does the Postal Service believe would not have been paid had the new DMCS wording been in effect for that time period?

[e] Please provide details of the types of failures that would be covered in the response to subpart d including the number of refunds paid and their dollar amount.

**RESPONSE:**

a. – b. The wording has not been drafted; however, it would be similar to the current wording and would incorporate any DMCS revisions recommended by the Commission and approved by the Governors.

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**DBP/USPS-71. (CONTINUED)**

**RESPONSE:**

c. The Postal Service disagrees with your opinion that a "LITERAL reading of the overly broad wording of the exclusions for not having to pay refunds could be utilized." Field employees responsible for approving refunds would be provided guidance that limits discretion to rare circumstances, and the details of this guidance would be developed if the proposed classification change for refunds is recommended and approved. Also see response to OCA/USPS-T35-5.

d. –e. *There is no information available to answer these questions. It is not clear how the Postal Service would have exercised its authority under the proposed language for the one-year period prior to September 11. Moreover, it is unclear whether such authority would have been applied on a nationwide or local basis or at all. However, as highlighted in the testimony of witness Mayo (T-35) and in the response to OCA/USPS-T35-5, the circumstances in which the proposed DMCS provisions would be invoked would be extraordinarily rare.*



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DBP/USPS-73      Please confirm, or explain if you are unable to do so, that:  
[a] Priority Mail which is handled by Fedex will be transported through their hub in Memphis [disregard mail destined for the Memphis area which obviously will not be transported out of the hub]. [b] It is possible for mail which is destined to one point on the west coast from another nearby point on the west coast to travel the distance equivalent of the distance across the country because it travels into and out of the hub in Memphis. [c] The total distance that an article travels in going from A to B through the hub in Memphis will have very little relationship to the actual distance from A to B, namely, it will vary from being relatively equal to the distance from point A to B to being equal to approximately twice the distance between them.

RESPONSE

- (a)      Confirmed that FedEx will most likely route Priority Mail through its Memphis hub.
- (b)      It depends what is meant by "nearby". Each office has its own policy for holding out Priority Mail to locations sufficiently "nearby". This hold out volume does not move via FedEx. However, it is possible that Priority Mail that is not held out will fly out and back via Memphis by FedEx.
- (c)      Assuming that the mail actual goes via FedEx through Memphis, the actual distance traveled may be the same, or longer than the direct distance from A to B, simply because the shortest distance between two points is a straight line.

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**DBP/USPS-74**

[a] Please confirm, or explain if you are unable to do so, that Express Mail rates used to be zoned rates based on the distance between the origin and destination.

[b] Please confirm, or explain if you are unable to do so, that the present Express Mail rates are unzoned and are the same regardless of the distance between the origin and destination.

[c] Please provide all of the reasons why the rate system was changed and level of significance for each of the reasons provided.

**RESPONSE:**

a. Confirmed.

b. Confirmed.

c. See PRC Op., R84-1, Vol. 1 at 588.

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**DBP/USPS-81** [a] With respect to the proposed change to DMCS Section 232c adding the requirement for machinability in addition to size, provide the proposed DMM wording to implement this change. [b] Please explain why a 6 by 9-inch one-ounce letter with a metal clasp would require the non-machinability surcharge? [c] Please explain why a single key taped to a card so as not to be loose would require the surcharge while one or more coins taped to a card would not. [d] How rigid is rigid in the "rigid or odd-shaped" definition? Does a paper product such as a piece of cardboard fall into this category? [e] Does a single coin taped to a card "bend easily when subjected to a transport belt tension of 40 pounds around an 11-inch diameter turn"? Would multiple coins bend easily? Would the diameter of the coin affect the ability to bend easily? How does a mailer make this determination? [f] Please confirm, or explain if you are unable to do so, that equipment COULD damage any piece of mail. [g] How does a mailer determine the point where the mailpiece is now "too flimsy" so as to require the surcharge? [h] Would a single sheet of 20-lb paper folded in thirds require the surcharge? [i] Does the address have to be parallel to the longest dimension in order to avoid paying the surcharge? [j] Confirm, or explain if you are unable to do so, that in a rectangular mailpiece if the address is parallel to the shortest dimension it will be perpendicular or 90 degrees to the longest dimension. [k] For all angles between 1 degree and 89 degrees that the address forms with a line that is parallel to the longest dimension will the surcharge apply? [l] If a folded mailer has the folded edge both parallel and perpendicular to the longest dimension [such as might be obtained by folding an 8.5 by 14 sheet of paper into quarters], will the surcharge apply? [m] If the folded self-mailer is completely sealed on all sides, will the surcharge apply? [n] If the booklet-type piece is completely sealed on all sides, will the surcharge apply? [o] Describe the characteristics that distinguish between a "folded self-mailer" and a "booklet-type piece". [p] Quantify the level of gloss on a postcard that would require an LMLM label? How does a mailer determine this level? [q] With respect to each of the stamped cards that the Postal Service has sold over the years of the type similar to the Santa cards and Baseball Fields cards that were issued this year, is the level of gloss on these cards such that it could require an LMLM label and thereby be subject to the surcharge? [r] If the postcard has a level of gloss as to require an LMLM label, does the surcharge apply only when the label covers the address and/or message? [s] If an LMLM label is applied which covers the address and/or message, does the surcharge apply regardless of level of gloss? [t] Does the picture on a postcard qualify as part of the message? [u] Does the restriction on not covering part of the message, reduce the value of the postcard by reducing the area which may be utilized for the message? [v] Does the surcharge apply if an LMLM label is utilized on other than a postcard? [w] If an LMLM label is utilized for any reason other than gloss on a postcard, such as might occur because a mailpiece has received an incorrect barcode or the mailpiece is being forwarded or returned, does it now require payment of a surcharge? [x] Does the legibility, neatness, size, and other characteristics of the addressing have any effect on the application of a

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surcharge? If so, please fully explain. [y] If a mailpiece is rejected from automation and ends up in the manual operation for any of the reasons specified on lines 17 to 21 of page 10 of USPS-T-39, will it then require a surcharge? If so for any of the conditions mentioned, please explain fully.

**Response:**

- (a) See attached. It should be noted that the criteria have yet to be finalized, which explains why the attached criteria differ from earlier submissions and may very well differ from future DMM language.
- (b) The metal clasp would likely prohibit the use of automation equipment to process the piece. The clasp could catch during automated processing and cause a jam, damage to the mailpiece, or damage to the equipment.
- (c) Loose items, such as coins, could become easily detached from the mailpiece or be projected from the mailpiece during automated processing. It is possible that certain non-bulky keys could be secured in such a way that the piece would still be considered machinable.
- (d) See criterium e. attached. It would depend on the rigidity of the cardboard.
- (e) This cannot be determined since the rigidity of a letter containing a coin or coins taped to a card would depend in large part to the card used. The determination of whether the piece is machinable or non-machinable would be based on criterium e. It would seem that the diameter of the coin could have an effect on the ability of the piece to adhere to criterium e. This is no different than the existing criteria for automation letter rates.
- (f) Confirmed.

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- (g) See criterium f. attached, which is consistent with the existing BRM card criteria.
- (h) No.
- (i) Yes.
- (j) Confirmed.
- (k) It is expected that a tolerance will be allowed when the final rules are published or when criterium g. as written in the attachment is adopted in practice. For example, OCR standards currently allow for a 5-degree skew tolerance relative to the bottom of the mailpiece (DMM C830.2.8).
- (l) No.
- (m) No.
- (n) No.
- (o) A folded self-mailer is self-contained by folds, while a booklet-type piece would have a bound edge typically fastened with staple(s).
- (p) – (w) Excessive varnish or gloss will not be a criterium for determining whether a piece is non-machinable. Cards will not be subject to the proposed non-machinable surcharge.
- (x) No. Legibility has nothing to do with machinability.
- (y) No.

**Nonmachinable Criteria - DRAFT**

A letter-size piece is nonmachinable if it meets any of the criteria listed below:

- a. Has an aspect ratio (length divided by height, where length is the edge parallel to the address) of less than 1.3 or more than 2.5.
- b. Is polybagged or polywrapped.
- c. Has clasps, strings, buttons, or similar closure devices.
- d. Contains lumpy items such as pens, pencils, keys, and loose coins.
- e. Is too rigid (does not bend easily when subjected to a transport belt tension of 40 pounds around an 11-inch diameter turn).
- f. For pieces more than 4 1/4 inches high or 6 inches long, if the thickness is less than 0.009 inches.
- g. Has a delivery address parallel to the shortest dimension of the mailpiece.
- h. For folded self-mailers, when the folded edge is not parallel to the longest dimension, regardless of the use of tabs, wafer seals, or other fasteners.
- i. For booklet-type pieces, when the bound edge (spine) is not the longest edge of the piece or is not at the bottom, regardless of the use of tabs, wafer seals, or other fasteners.

## 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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Joseph K. Moore

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
December 10, 2001