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

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES TO UNITED STATES POSTAL SERVICE (OCA/USPS-307-311) December 14, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,

Shelly A. Drufuss Shelley S. Dreifuss

Acting Director

Office of the Consumer Advocate

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6830; Fax (202) 789-6819 e-mail: dreifusss@prc.gov OCA/USPS-307. The following refers to the USPS response to OCA/USPS-299, dated December 10, 2001.

- (a) The Postal Service indicated its process of updating site-specific Express Mail network data to each POS One terminal including the fact that the NCR POS One system displays "a warning message for articles addressed to post office boxes that are scheduled for delivery over the weekend." When the "1-800-ASK-USPS" phones are answered and a customer asks for the delivery standards for First-Class, Priority and Express Mail, does the USPS Ask representative have information available such that they can give (1) customers "a warning message for articles addressed to post office boxes that are scheduled for delivery over the weekend;" and, (2) do USPS Ask representatives give customers the warning?
- (b) If your response to part "(a)1" of this interrogatory is other than affirmative, please explain why the USPS ASK representative does not have the information.
- (c) If your response to part "(a)2" of this interrogatory is other than affirmative, please explain why the USPS Ask representative does not provide the customer with the courtesy warning.

OCA/USPS-308. Please refer to the answer given in response to interrogatory OCA/USPS-254. In the cited response, the Postal Service informed OCA that Electronic Marketing Reporting System data are only maintained for two years. Thus, data requested for FY1990 and FY1995 were not available. Please provide the data requested in interrogatory OCA/USPS-254 for whatever years are currently available.

OCA/USPS-309. Please refer to the response to interrogatory OCA/USPS-286(a). This response indicates that the Postal Service does not offer Delivery Confirmation service for First-Class letters. The page (81) attached from Postal Bulletin 22043 (dated 2-8-01) indicates that Delivery Confirmation should be suggested by retail associates to mailers of Valentine's Day cards. The "Retail Coaches' Corner" reminds retail associates that cards are sent in many colors and sizes. Delivery Confirmation should be suggested as an added value. If the card sent does not meet requirements, a surcharge must be applied.

- (a) Please confirm that Valentine's cards (and other greeting cards) are typically sent as First-Class letters. If this statement is not confirmed, then explain fully.
- (b) Please confirm that there is no size-related surcharge for Priority Mail pieces. If this statement is not confirmed, then explain fully.
- (c) Please confirm that the only reasonable conclusion that can be drawn from the cited paragraph is that retail associates should suggest Delivery Confirmation for Valentine's Day cards mailed as First-Class letters, and that the associate should determine whether the letter is subject to a nonstandard surcharge based on the size of the letter. If this statement is not confirmed, then explain fully.

OCA/USPS-310. Please refer to the response to interrogatory OCA/USPS-286. In this response, the alleged drawbacks of offering Delivery Confirmation with First-Class letters are described and contrasted with the processing and handling of Certified Mail First-Class letters.

(a) The response to part (c) states that Certified Mail Detectors on BCSs can not read Delivery Confirmation labels because the Delivery Confirmation labels lack

fluorescent taggant. Please confirm that Delivery Confirmation labels could be manufactured (for sale by the Postal Service) with fluorescent taggant just as Certified Mail labels are at the present time. If this statement is not confirmed, then explain fully.

- (b) In the response to part (c), OCA's attention is directed to witness Kingsley's response to AMZ/USPS-T36-4e, 6-8. In response to AMZ/USPS-T36-6b, it is stated that mailers who print their own Delivery Confirmation labels generally do not include special tagging or fuorescence. Isn't it correct that retail Delivery Confirmation for First-Class letters could be limited to labels printed by the Postal Service, containing the taggant or fluorescence necessary to separate them from the remainder of First-Class letters during Delivery Point Sortation? If this question is not answered affirmatively, then explain fully.
- (c) OCA's attention is also directed to USPS-T-39, page 8, lines 17-30. There witness Kingsley states that during Delivery Point Sortation (Certified Mail labels with taggant or fluorescence) are separated from other letters, but that it is impractical to obtain delivery scans for non-Certified Mail letters since they are not tagged. Isn't it correct that if Delivery Confirmation labels were to be manufactured with taggant and sold by the Postal Service as a retail product, they could then be separated from other First-Class letters just as Certified Mail letters are (during the bar code sortation for DPS) and that they could be scanned for delivery just as Certified Mail letters are at the present time? If this question is not answered affirmatively, then explain fully.

- (d) The OCA's attention is also directed to AMZ/USPS-T36-6b in which the statement is made that Delivery Confirmation is being limited in connection with the original intent, i.e., to offer it with expedited and package services. Isn't it correct that the Postal Service could adopt a broader policy that would extend Delivery Confirmation to pieces different than those originally intended? If this question is not answered affirmatively, then explain fully.
- (e) Another difference noted in witness Kingsley's testimony is that in February 2002, multiple stackers will be held out for Certified Mail letters during outgoing and incoming bar code sortation. If Delivery Confirmation-labeled First-Class letters contained the same taggant contained in a Certified Mail label, then couldn't Delivery Confirmation letters be held out with Certified Mail letters? If this question is not answered affirmatively, then explain fully.
- In response to interrogatory OCA/USPS-286(c), it is stated that fitting the entire Delivery Confirmation label, destination address, return address and postage payment on the front of the mailpiece could be an issue. If Delivery Confirmation labels were manufactured with the same dimensions as Certified Mail labels, then isn't it correct that the size of a Delivery Confirmation label for First-Class letters would pose no greater a problem than the size of a Certified Mail label currently presents? If this question is not answered affirmatively, then explain fully.
- (g) It is also stated in response to part (c) that placement of the Delivery Confirmation label on the front of the letter could "interfere with and reduce OCR readability due to the additional 'noise' and would increase the image size, which

negatively affects RBCS image transmission and storage." Isn't it correct that a Delivery Confirmation label manufactured with the same physical characteristics as a Certified Mail label would present no greater OCR and RBCS problems than Certified Mail-labeled letters do today? If this question is not answered affirmatively, then explain fully.

(h) In response to part (d), it is stated that significant training and productivity costs would be incurred. Couldn't these costs be recovered in the fee established for Delivery Confirmation for First-Class letters? If this question is not answered affirmatively, then explain fully.

OCA/USPS-311. Please refer to the response to interrogatory OCA/USPS-300. It is stated that:

The Postal Service provides postmasters with information on service objectives, and retail associates regularly use these service objectives to provide estimates of delivery time frames in assisting customers with their decisions about which service would best meet the customer's needs.

- (a) Provide all documentation that "the Postal Service provides postmasters on service objectives" with respect to First-Class delivery times.
- (b) Is it the Postal Service's policy to inform customers about the specific First-Class service standard that applies when a question is posed by a customer about a First-Class mailing between a specific ZIP code pair or specific city/town pair?

 Please explain fully.
- (c) Is it the Postal Service's policy to give customers who inquire about the length of time for delivery of a First-Class Mail piece for a specific ZIP code pair or city/town pair the answer that First-Class Mail is delivered sometime during the

- period "one to three days" without specifying that one, two or three days is the service standard for the stated ZIP code or city/town pair? Please explain fully.
- (d) Provide any existing documentation concerning Postal Service policy as described in parts (b) and (c) of this interrogatory.

What's in Store



Welcome to the February Corner!

This Month's Questions:

- 1. Signature Confirmation will be available for what class(es) of mail?
- 2. Does nonstandard surcharge apply for international Letter-Post mail?

(Answers are at the end of this page.)

Last Month's Questions:

Let's review the questions and answers from January's article (*Postal Bulletin* 22041, 1-11-01).

- 1. Can currently inventoried stamped paper stationery be sold after the rate increase? Yes, they must be revalued and proper postage affixed.
- 2. Did any Express Mail rates decrease? Half-pound PO to PO.
- 3. Will there be different nonmachinable surcharges for Parcel Post depending on the rate? *Intra is now included.*
- 4. Is it true that if a customer's package weighs less than a pound, Parcel Post rates can be offered? Yes.
- 5. What is Media Mail? The new name for Special Standard Mail.
- 6. Did the fees for Delivery Confirmation service change? *Priority Mail fee is \$.40. Package Services fee is \$.50.*

Valentine's Day Suggestions for Retail Associates:

Remember, cards sent to that special person are sent in many colors and in different sizes. Suggest Delivery Confirmation as an added value. Verify that the size meets requirements; if not, a surcharge is applied.

Retail Calendar:

Post your new Retail Calendar by February 6th. Review the information with retail associates.

Retail Coaches Web Site:

Our goal is to achieve 100% listing of all certified retail coaches by Accounting Period 11. The site can be found at http://rpsweb.usps.gov/coaches/home.asp.

Answers to questions:

- 1. Signature Confirmation is available for Priority Mail and Package Services.
- 2. The rules for nonstandard surcharge also apply to international mail.

Submit questions or comments via cc:Mail to Retail Coaches Comer.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Stephenie Cefacence Stephanie Wallace

Washington, D.C. 20268-0001 December 14, 2001