

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-85-103]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The instructions contained in the interrogatories DBP/USPS-1-82, dated November 26, 2001, are incorporated herein by reference.

December 17, 2001            Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-85        Please refer to your response to DBP/USPS-17. Please provide copies of the directives and/or citation of the regulations. If there is none, state the authority for the responses to the original interrogatory.

DBP/USPS-86        Please refer to your response to DBP/USPS-28. I am confused by the response to subpart d which states that 19% of the mail is not processed through a machine equipped with a Certified Mail Detector [CMD] while the responses to the other subparts appear to indicate that CMDs are in place for all mail. Please clarify and, if necessary, reanswer those parts of DBP/USPS-28 as needed.

DBP/USPS-87        Please refer to your response to DBP/USPS-35. Your response to subparts b and d through g refers to a response to Docket R2000-1. Subpart d requires update information. Please respond to the original subpart d.

DBP/USPS-88        Please refer to your response to DBP/USPS-57 subparts f through h. Please respond to the interrogatory if the concept of greater cost is replaced by the concept of requiring a greater likelihood of manual processing and the concept of lower cost is replaced by the concept of requiring a greater likelihood of automated processing.

DBP/USPS-89 Please refer to your response to DBP/USPS-65 subparts a and b. [a] What is the significance of the word "Presumably" in the response to these two subparts? [b] Has an evaluation been made to allow for an unqualified yes response to either or both of these subparts? If so, provide details.

DBP/USPS-90 Please refer to your response to DBP/USPS-65 subpart d. I will follow-up on this subpart even though the outstanding answer to DBP/USPS-84 may clarify the response due to the time limit for follow-up interrogatories. [a] There is no response to the service on some or all of the legal holidays. [b] Why are Chignik and Chignik Lagoon on the list since they have daily service? [c] Confirm, or explain if you are not able to do so, that King Cove is on the list because its daily service doesn't arrive until 5:20 PM, or after the Express Mail delivery time.

DBP/USPS-91 Please refer to your response to DBP/USPS-69. The interrogatory asked for an explanation if you were not able to confirm my statement. That explanation was not provided. Please advise why you are not able to confirm my statement.

DBP/USPS-92 Please refer to your response to DBP/USPS-74 subpart c. My interrogatory asked for the reasons [and the level of significance of each] why Express Mail rates were changed from a zoned rate system to an unzoned rate system. Which particular lines on page 588 of Docket R84-1 provide the response to this specific question?

DBP/USPS-93 Please refer to your response to OCA/USPS-292. [a] Please provide a breakdown of the <2 weekday category into the following categories: earlier than 8 AM, 8 AM to 8:59 AM, 9 AM to 9:59 AM, 10 AM to 10:59 AM, 11 AM to 11:59 AM, 12 Noon to 12:59 PM, 1 PM to 1:59 PM. [b] Please provide a breakdown of the 4 PM to 4:59 PM weekday category into the following categories: 4 PM to 4:14 PM, 4:15 PM to 4:29 PM, 4:30 PM to 4:44 PM, and 4:45 PM to 4:59 PM. [c] Please provide a breakdown of the 5 PM to 5:59 PM weekday category into the following categories: 5 PM exactly, 5:01 PM to 5:14 PM, 5:15 PM to 5:29 PM, 5:30 PM to 5:44 PM, and 5:45 PM to 5:59 PM. [d] Please provide a breakdown of the <10 Saturday category into the following categories: earlier than 8 AM, 8 AM to 8:59 AM, 9 AM to 9:59 AM. [e] Please advise the percentage of the total number of boxes that are collected on all five weekdays. [f] Please advise the percentage of the total number of boxes

that are collected on less than all five weekdays. [g] Please explain the reasons for those boxes that appear in the response to subpart f. [h] Please advise the percentage of the total number of boxes that are not collected on Saturday. [i] Please explain the reasons for those boxes that appear in the response to subpart h.

DBP/USPS-94 Please refer to your response to OCA/USPS-299. To protect my ability to follow-up this interrogatory within the seven-day time period, I again ask subparts a through p of DBP/USPS-67 since the response to both subpart d of OCA/USPS-25 and OCA/USPS-299 contain the same information that requires clarification.

DBP/USPS-95 Please refer to your response to OCA/USPS-299. Since the response to subparts a, b, and c of DBP/USPS-65 appears to indicate that with the exception of the 20 offices noted, Express Mail will arrive at all other facilities 365/6 days a year, will arrive in time to allow for delivery at all authorized addresses within the delivery area of that facility by the scheduled delivery time no later than the second day after mailing, please explain why the terminals in use at retail counters can not be programmed to indicate the inability to achieve the proper delivery at these 20 facilities.

DBP/USPS-96 Please refer to your response to OCA/USPS-299. Besides the references to post office boxes and street delivery, are there any other forms of delivery for Express Mail? If so, please specify.

DBP/USPS-97 Please refer to your response to DBP/USPS-66 subpart a. I would like to clarify the definition of a box. [a] Is there any particular shape that a box is restricted to? If so, what are they? [b] May it be in a rectangular solid shape [similar to a cereal box]? [c] May it be in a cylindrical shape [similar to a tin can]? [d] Is there a minimum size limit other than the requirement to contain the required indicia noted in AMZ/USPS-T36-1 subpart d on one face of the box? If so, what is it? [e] Is there any restriction on the material that may be used for the box [so long as it would be mailable without the Delivery or Signature Confirmation service]? If so, please explain. [f] May the box be made of a cardboard similar to that which is used for a Priority Mail flat rate envelope?

DBP/USPS-98 Please refer to your response to DBP/USPS-71. [a] Please advise when the wording will be available. [b] Please provide a draft of the proposed wording in a similar

manner to that which was provided for the definition of a parcel in Delivery or Signature Confirmation in AMZ/USPS-T36-1. [c] Will the words or concept of under “rare circumstances” and/or “extraordinarily rare” and/or “circumstances beyond the control of the Postal Service” be included in the DMM and/or on the Express Mail label and/or in communications to all postal facilities? If so, provide details. [d] Please explain why the words or concept of under “rare circumstances” and/or “extraordinarily rare” and/or “circumstances beyond the control of the Postal Service” are not included in the proposed DMCS wording.

DBP/USPS-99 Please refer to your response to DBP/USPS-71 subpart c. [a] Please advise which words in the proposed DMCS Section 182.51 relate to applying only under “rare circumstances” and/or “extraordinarily rare” and/or “circumstances beyond the control of the Postal Service”. [b] If there are no such words, please explain why the proposed DMCS wording does not contain such words or words of similar import. [c] Please confirm that the words “delay or cancellation of flights” contained in proposed DMCS Section 182.51d do not specify the minimum delay that constitutes a delay and therefore a delay of even one minute in a flight would excuse the Postal Service from providing a refund. [d] Please confirm that the words “delay or cancellation of flights” contained in proposed DMCS Section 182.51d do not specify that the delay or cancellation of a flight need be the cause of the failure of timely delivery. [e] Please confirm that the Postal Service has a series of “transportation networks” in place for the acceptance, transportation, and delivery of Express Mail that includes all activities related to the acceptance, transportation, and delivery of Express Mail starting at the acceptance of the article and ends with the ultimate delivery of the article. [f] Please confirm that with the exception of mail to or from the 20 facilities noted in the response to subparts a, b, and c of DBP/USPS-65, Express Mail will arrive at all other facilities 365/6 days a year, will arrive in time to allow for delivery at all authorized addresses within the delivery area of that facility by the scheduled delivery time no later than the second day after mailing, and that the various “transportation networks” are in place to allow for this. [g] Please confirm that there are “transportation networks” in place to allow for Express Mail which is guaranteed for overnight delivery to arrive at all facilities scheduled for that service 365/6 days a year, to arrive in time to allow for delivery at all authorized addresses within the delivery area of that facility by the scheduled delivery time on the day after mailing. [h] Please confirm that with the exception of mail to or from the 20 facilities noted in the response to subparts a, b, and c of DBP/USPS-65, any failure to meet the timely delivery of an Express Mail article would be as a

result of one or more “breakdowns in transportation networks”. [i] Please confirm that proposed DMCS Sections 182.51 and 182.52 are mutually exclusive, namely, the concept of “extraordinary reasons” does not apply to the circumstances contained in Section 182.51. [j] Please confirm that at the present time a mailer desiring a refund will go to a postal facility and make a request and the postal facility will check on the tracing network and confirm that delivery or attempted delivery was or was not made on time and if it was not made on time will make the refund. [k] Please confirm that the current postal tracking system will not provide any information as to the reason for the failure to be delivered on time. [l] What changes will be made to the tracking system to allow for this information? [m] When will these changes be implemented? [n] Will this information also be made available on the public tracking system? If not, why not? [o] Please explain and discuss any subparts that you are not able to confirm.

DBP/USPS-100 Please refer to your response to DBP/USPS-71 subparts d and e. [a] If you are not able to provide any instances where this added authority would have been utilized prior to September 11<sup>th</sup>, please explain why each of the specific proposals is being made to the DMCS [namely, subparts a through h of Section 182.51 as well as Section 182.52] [b] Since the filing for this Docket was made only 13 days after September 11<sup>th</sup>, was this proposed change to the DMCS proposed prior to September 11<sup>th</sup> or was it a last minute change made to the proposal after the events of September 11<sup>th</sup>?

DBP/USPS-101 Please refer to your response to DBP/USPS-73 subpart b. Can you provide me with examples of offices on the west coast that are “nearby” enough to each other that they will be within the third zone to each other and yet will normally process Priority Mail between them via the FedEx Memphis Hub? If so, provide the examples.

DBP/USPS-102 Please refer to your response to DBP/USPS-73 subpart c. [a] Please confirm, or explain if you are unable to do so, that when Priority Mail travels through the FedEx Memphis Hub, the distance can range from the same distance such as when the mail is transported between Los Angeles and Columbia SC which are on an approximate straight line to a distance which is much greater than the direct distance, such as the example provided in POIR Number 5 / Question Number 8 for flight between Los Angeles and Sacramento - direct distance of 373 miles vs. an approximate distance of 3300 miles between them when flying through Memphis. [b] Please advise the relationship in air transportation costs as related to the distance traveled.

DBP/USPS-103 Please refer to your response to DBP/USPS-81. [a] Please advise the reasons for making each of the changes to the nonmachinable criteria contained in the original Testimony USPS-T-39 as compared to the attachment to DBP/USPS-81 - additions to the criteria, deletions from the criteria, and changes in the wording of a criteria. [b] Is non-rectangular letter size mail even mailable? [c] The surcharge has been added to apply for pieces more than 4-1/4 inches high or 6 inches long, if the thickness is less than 0.009 inches. If part of the mailpiece is less than 0.009 inches thick and the remainder of the mailpiece is 0.009 inches thick or thicker, will the surcharge apply? If not, does the proportion of the mailpiece that is less than 0.009 inches thick vs. the part that is 0.009 inches thick or thicker have any bearing on the response? If so, what bearing does it have? [d] How will payment of the surcharge on a 6 by 9-inch one-ounce letter with a metal clasp reduce the possibility of a jam, damage to the mailpiece, or damage to the equipment? [e] My original subpart c was attempting to make the distinction that the word loose only appeared before coins so that coins could be attached to an insert while a key would require the surcharge whether it was loose or not. Please reanswer. [f] If a non-bulky key could be secured, how does the wording allow for mailing without the surcharge? [g] How lumpy is the lumpy in criterium d? [h] Why does the degree of lumpyness in criterium d depend on the rigidity in criterium e? [i] How does a mailer of a single piece of mail make the determination as to whether or not the letter is too rigid and therefore requires payment of the 12-cent surcharge? Will all retail counters have a device to measure compliance with this criteria? [j] If the 5-degree skew tolerance is applied, how will the mailer of a single piece of mail make that determination as to whether the surcharge is required? Will all retail counters have a device to measure compliance with this criteria? [k] How would that 5-degree skew tolerance apply to handwritten addresses? Would it apply to all lines of the address and to all parts of each line of the address to which it applies? [l] How will the mailer of an article described in subparts l, m, or n of my original interrogatory know that the surcharge does not apply after reading the proposed criteria? [m] The response to subpart x of my original interrogatory appears to answer "no" to all four criteria of the addressing but only identifies the legibility in the following sentence. What is the status of neatness, size, and other characteristics of the addressing?

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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.

David B. Popkin      December 17, 2001

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