

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBP/USPS-10-14 and 16)

The United States Postal Service hereby provides the responses to the following interrogatories of David B. Popkin: DBP/USPS-10-14 and 16, filed on November 26, 2001.

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

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December 17, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF DAVID B. POPKIN**

**DBP/USPS-10.** May Express Mail [Next Day and Second Day Service] be mailed at all postal facilities within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2001 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military - main offices, stations, branches, rural carriers, and other points at which other classes of mail may be tendered - during their normal office hours? If not, provide any exceptions either by category or by specific office[s].

**RESPONSE:**

Yes.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
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**DBP/USPS-11.** May Express Mail [Next Day and Second Day Service] be addressed to all valid addresses within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2001 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military? If not, provide any exceptions either by category or by specific office[s].

**RESPONSE:**

Yes.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF DAVID B. POPKIN**

**DBP/USPS-12.**

[a] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-10 have a listing of those 3-digit ZIP Code prefixes for which Next Day delivery will be achieved.

[b] Confirm, or discuss and explain if you are unable to do so, that all postal facilities that accept Express Mail as noted in the response to DBP/USPS-10 have a cutoff time, established by the Postmaster by which Express Mail must be presented to achieve Next Day delivery.

[c] Must there be a reasonable minimum amount of time from the opening of the retail window service to the cutoff time to allow for mailers to deposit Express Mail on that day in order to achieve Next Day delivery? If not, why not?

[d] If a facility has an cutoff time as noted in DMM E500.5.3 for Next Day service that is after 5 PM, must the time noted in DMM E500.6.2 for Second Day service be equal to or later, but not earlier than, the Next Day cutoff time? If not, why not?

[e] Confirm, or discuss and explain if you are unable to do so, that an Express Mail article may be mailed at any facility noted in response to DBP/USPS-10 at any time that there are retail window service hours.

**RESPONSE:**

a. Confirmed.

b. Confirmed, except the cutoff time is based upon the network that supports Express Mail.

c. Every effort is taken to ensure that maximum window time is allowed for customers utilizing Express Mail, however, this window time is established and limited to the network that supports Express Mail.

d. The cutoff time for Second Day service may be the same cutoff time or a later cutoff time than that for Next Day Service, as authorized by the postmaster, based upon the network that supports Express Mail.

e. Confirmed.

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**DBP/USPS-13**

[a] With respect to whether or not the Next Day Service will be achieved by 12 Noon or 3 PM, is this a function of the dispatching office, the delivery office, or both?

[b] What criteria are utilized to make this determination?

[c] Does it apply all days of the year? If not, what are the exceptions?

[d] Does the same time of the day apply equally to Next Day and Second Day service? If not, please explain.

**RESPONSE:**

a. – b. It is a function of both the originating and destinating ZIP Codes.

c. Yes, the same logic is applied to determine the level of service.

d. Yes.

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INTERROGATORIES OF DAVID B. POPKIN**

**DBP/USPS-14.** For this interrogatory, the following assumptions apply:

1. The article will be deposited at a facility as noted in the response to DBP/USPS-10.
2. The article will be addressed to an address noted in the response to DBP/USPS-11.
3. The window hours for this post office are 8 AM to 6 PM.
4. The cutoff time for Express Mail Next Day Delivery service is 2 PM.
5. The list refers to those 3-digit ZIP Codes that are designated for overnight service.
6. The time of 10 AM was chosen to represent a time both before the 2 PM cutoff time and before 5 PM as noted in DMM Section E500.6.2 and can be as early as 12:01 AM; the time of 3 PM was chosen to be after the 2 PM cutoff time but before the 5 PM as noted in DMM E500.6.2 and before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight; the time of 5:30 PM was chosen to be after the 5 PM as noted in DMM E500.6.2 and after the 2 PM cutoff time but before the close of window service hours or other ability to mail the article and may be as late as 12 Midnight. [If the choice of time is significant, please explain in your response.]
7. All articles are mailed on Day 0 which for convenience will be noted as Monday [if the choice of day is significant, please explain in your response]. Please confirm, or explain and discuss if you are unable to confirm, that articles mailed as noted will receive a refund if they are not delivered by the time shown [other than for the exceptions shown in DMM E500.5.3 and 6.2]:
  - [a] Mailed Monday at 10 AM destined for an office on the list - will be delivered by 12 Noon or 3 PM Tuesday.
  - [b] Mailed Monday at 3 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.
  - [c] Mailed Monday at 5:30 PM destined for an office on the list - will be delivered by 12 Noon or 3 PM Wednesday.
  - [d] Mailed Monday at 10 AM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.
  - [e] Mailed Monday at 3 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.
  - [f] Mailed Monday at 5:30 PM destined for an office that is not on the list - will be delivered by 12 Noon or 3 PM Wednesday.

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**RESPONSE:**

a. – f. Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF DAVID B. POPKIN**

**DBP/USPS-16**

[a] Confirm, or explain if you are unable to do so, that for Express Mail articles other than those addressed to a Post Office Box or General Delivery, an actual physical attempt at the addressee's location must be made prior to the guaranteed time or it will be considered a failure [and thus a refund of postage may be obtained] unless it meets one of the two exemptions in DMM Section E500.5.3/6.2 a and b.

[b] Confirm, or explain if you are unable to do so, that Express Mail which is addressed to a Post Office Box or General Delivery will constitute a failure if the addressee does not have access to the post office box and/or the ability to claim the article such as might occur if the box section was closed or the notice of arrival was placed in the box but it was not possible for the addressee to claim the mail.

[c] Confirm, or explain if you are unable to do so, that contacting an addressee by telephone or by requiring an addressee to pick up their Express Mail at a facility would constitute a failure [other than PO to PO service].

[d] May Post Office to Post Office Service be sent to all post offices in the areas as noted in response to DBP/USPS-11? If not, provide a listing of all offices to which it may be sent.

[e] Confirm, or explain if you are unable to do so, that the guaranteed delivery times for both PO to Addressee and PO to PO will be the same areas - both overnight and second day.

[f] Clarify DMM Section E500.6.4 - if a PO-PO Express Mail article is sent to a second day area on a Saturday, will delivery be guaranteed on Monday or Tuesday [assume the delivery office is closed on Sunday and open the other six days of the week - is delivery made on the second business day after mailing - Tuesday in this case - or is it delivered on the first business day which is on or after the second day - Monday in this case]?

**RESPONSE:**

a. Confirmed.

b. Not confirmed. Delivery of Express Mail addressed to a post office box is attempted when a notice is placed in the box, regardless of whether or not the customer has access to the box at that time. Delivery of Express Mail addressed to a general delivery address is attempted when the article arrives at the postal



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facility, regardless of whether or not the customer has access to the postal facility at that time.

c. Although a telephone call could be provided as a courtesy to the customer, if the mailpiece is not delivered until after the guaranteed time this would be considered a failure.

d. No. IRTs and POS-1 systems will flag any Express Mail with post office to post office service if the three-digit ZIP Code pairs are not authorized for the service. A list of the valid three-digit ZIP Code pairs for Express Mail post office to post office service is attached.

e. Assuming both types of Express Mail make the cutoff time and Post Office to Post Office service is available, confirmed.

f. Delivery will be guaranteed on Tuesday.

**Post Office to Post Office - Express Mail  
Destinating 3-Digit ZIP Codes**

**Effective 12/01/01**

Zip Span	Svc	Zip Span	Svc	Zip Span	Svc	Zip Span	Svc	Zip Span	Svc
105-105	P*	282-282	A*	436-436	A*	641-641	A*	794-794	P*
106-106	P*	292-292	P*	441-441	A*	661-662	A*	871-871	P*
107-107	P*	296-296	P*	454-455	A*	666-666	A*	891-891	A*
108-108	P*	328-328	A*	458-458	P*	681-681	A*	895-895	A*
109-109	P*	331-332	A*	462-462	A*	701-701	A*	900-900	A*
125-125	P*	336-337	A*	468-468	A*	731-731	P*	936-938	P*
126-126	P*	352-352	P*	481-481	P*	733-733	A*	940-940	P*
201-201	P*	372-372	A*	482-482	A*	741-741	P*	941-941	P*
212-212	A*	374-374	A*	483-483	P*	761-761	A*	951-951	A*
222-223	A*	375-375	A*	495-495	A*	770-770	A*	954-954	P*
237-237	A*	379-379	A*	524-524	A*	772-772	A*	958-958	A*
268-268	P*	381-381	A*	532-532	A*	782-782	P*	992-992	P*
274-274	P*	432-432	P*	537-537	P*	787-787	P*		

*Attachment to DBP/USPS-16*

## 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

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December 17, 2001