

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN
(DBP/USPS-95)

The United States Postal Service hereby provides its response to the following interrogatory of David B. Popkin, DBP/USPS-95, filed on December 17, 2001.

The 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

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
January 3, 2002

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.

Kenneth N. Hollies

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

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.

RESPONSE:

The response to OCA/USPS-299 fails to establish that POS ONE terminals cannot be programmed to indicate an inability to effect delivery. It may or may not be possible.