

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

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-123(A), 130(D), 138(A-B))

The United States Postal Service hereby provides its response to the following interrogatory of David B. Popkin: DBP/USPS-123(a), 130(d), and 138(a-b), filed on December 26, 2001. Objections were filed for interrogatories DBP/USPS-123(b-d), 124-130(a-c), 131-137, and 138(c-h) on January 7, 2002.

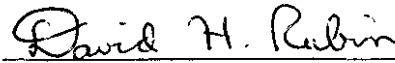
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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January 15, 2002

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DBP/USPS-123 Please refer to your response to OCA/USPS-236 subpart a attachment page 1. [a] What does the acronym PC stand for?

RESPONSE:

[a] PC stands for Performance Cluster.

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DBP/USPS-130 Please refer to your response to OCA/USPS-236 subpart a attachment pages 8 and 9. [d] Regarding the use of canceling machines at the Sacramento P&DC to process 3811's, [1] Who is the employer of the individual[s] who remove the return receipt cards from the mail piece? [2] Where are the canceling machines physically located? [3] Who is the employer of the individual[s] operating the canceling machines? [4] Does an employee of the addressee observe the removal of the return receipt cards from the mail piece? [5] Does an employee of the addressee observe the return receipt cards from the time they are removed from the mail piece until they are run through the canceling machine? [6] Does an employee of the addressee observe the operation of the canceling machines?

RESPONSE:

[d] [1] The Postal Service.

[2] The canceling machine is located in the postal processing plant.

[3] The Postal Service.

[4] No.

[5] No.

[6] No.

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DBP/USPS-138 Please refer to your response to OCA/USPS-236 subpart d attachment page 23. [a] Please provide any other instructions or guidelines that were prepared for use at Hartford other than the attachments of pages 21 to 27. [b] Please confirm, or explain and discuss if you are not able to do so, that my interpretation of the Certified Processing Flow is as follows: [1] All certified mail pieces will be directed to a number of USPS employees [5 in the chart provided] who will scan the article number on those pieces with a Certified Mail label containing a barcode. [2] One [or more] USPS employees will manually enter into the computer the Certified Mail number on those mail pieces that do not have a Certified Mail label with a barcode. [3] A manifest will be printed out which contains the article number of 500 pieces [the final printout of a series may contain less than 500 pieces]. [4] All of the certified mail pieces will then be transferred to a number of USPS employees [5 in the chart provided] who will remove the PS Form 3811's from the mail pieces. [5] Steps 1 through 4 will take place at the Postal Service facility. [6] The mail pieces will be delivered to the addressee. [7] A tray will be presented to the addressee containing the copies of the manifest and PS Form 3811's.

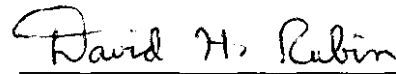
RESPONSE:

[a] There were no other instructions or guidelines provided for Hartford.

[b] Your understanding of the Certified Mail flow as defined for Hartford appears to be correct.

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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