

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

RECEIVED
JAN 16 4 11 PM '02
U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-114-120)

The United States Postal Service hereby provides responses to the following interrogatories of David B. Popkin: DBP/USPS-114-120, filed on December 18, 2001.

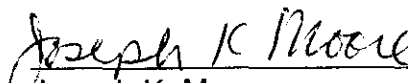
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
January 16, 2002

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

DBP/USPS-114 Please refer to your response to DBP/USPS-12 subpart b. Please confirm, or explain if you are unable to do so, that the cutoff time will be established by the Postmaster based upon the Express Mail network that is available to his/her office.

RESPONSE:

As is stated in the response to DBP/USPS-12 (b), confirmed.

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

DBP/USPS-115 Please refer to your response to DBP/USPS-12 subpart c. [a] Is it permissible for a Postmaster to establish a cutoff time on a given day which is either equal to or earlier than the opening of the window service on that day [so that mailers will in effect be unable to mail Express Mail that day to achieve the overnight service for the following day or second day service on the second day]. [b] Please provide a listing of any facility that does not provide at least one hour of window service prior to the cutoff time [show the name, state, ZIP Code, window opening time, Express Mail cutoff time, and day[s] of the week involved].

RESPONSE:

- a. No. The Postal Service would not be able to accept Express Mail at the window if a cutoff time was before the opening of window service.
- b. This information is not available.

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

DBP/USPS-116 Please refer to your response to DBP/USPS-13 subpart b. The criteria have not been provided. Please provide.

RESPONSE:

The criterion is whether or not the network can support delivery from the originating ZIP Code to the destinating ZIP Code.

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

DBP/USPS-117 Please refer to your response to DBP/USPS-13 subpart c. Please clarify your response. The interrogatory is attempting to confirm that if I can send Express Mail from Point A to Point B and have guaranteed delivery by 12 Noon the next day for articles being delivered on a weekday, the 12 Noon guarantee will also apply on Saturday, Sunday, and/or holiday deliveries.

RESPONSE:

Confirmed.

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

DBP/USPS-118 Please refer to your response to DBP/USPS-12 subpart b. [a] Please advise the date when the Postal Service changed its policy regarding the ability to avoid an Express Mail failure on mail addressed to a post office box by placing a notice in the box, regardless of whether or not the customer has access to the box at that time. [b] Please advise the reasons for making this change in policy. [c] Please advise how this change was communicated to the mailing public and provide copies of any printed material. [d] Please advise how this change was communicated to postal facilities and provide copies of any printed material. [e] Please advise the reasons why the Postal Service believes that it is providing a quality service by this procedure. [f] Must the notice be physically placed into the customer's post office box, or is it sufficient to claim timely delivery by the mere knowledge of the Postal Service that customer access is not available and the article has arrived in the area of delivery [such as the main office with the box at a postal station or at the P&DC with the knowledge that the boxes are closed at that associate office]? [g] Please clarify your response with General Delivery mail. Is timely delivery achieved [assuming a 12 Noon guarantee] if the article arrives at the facility at 11:30 AM and at the General Delivery window at 12:30 PM? [h] Please respond to subparts a through e of this interrogatory as they apply to delivery of mail addressed to General Delivery.

RESPONSE:

- a. – d. No change was made.
- e. See witness Moeller's testimony for a discussion of the value of service provided by Express Mail.
- f. The notice must be physically placed.
- g. No. The delivery time is defined as the time the mailpiece is made available for delivery. In this instance it would be when the article arrives at the General Delivery window.
- h. See responses to a-e above.

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

DBP/USPS-119 Please refer to your response to DBP/USPS-16 subpart d. [a] Please advise the significance of the A* and P* that appear on each entry under SVC. [b] Please confirm, or explain if you are not able to do so, that if a 3-digit ZIP Code appears on this list, PO-PO service will be available from all facilities anywhere in the country and addressed to all postal facilities that are within that 3-digit ZIP Code range for delivery by 10 AM overnight [for those offices that have overnight PO-Addressee service] and by 10 AM on the second day for all other offices - accounting for the delivery office being closed for weekend/holiday. [c] Please explain the rationale and criteria for choosing which 3-digit prefixes have been placed on this list since there are large cities on the list such as Los Angeles and Baltimore while other large cities are not on the list such as New York and Chicago and there are small cities on the list such as Elizaville and Lagrangeville, New York. [d] Please explain the apparent inconsistencies that exist in the choice of these 3-digit prefixes, such as Arlington and Alexandria VA have service but the rest of Northern Virginia SCF 220 and 221 do not including the mail processing facility at Merrifield VA. Another example is where Greenville SC is both 293 and 296 and only 296 is on the list. [e] Please advise the total number of valid 3-digit ZIP Codes prefixes in the country that have delivery facilities to which PO-PO service may be sent. [f] What percentage of all valid 3-digit ZIP Code prefixes having delivery facilities does the PO-PO list represent? [g] Please advise all of the delivery facilities that are available for PO-PO service in the 733 prefix. [h] Based on the response to subpart f of this interrogatory, how can this service be considered to be a nationwide service?

RESPONSE:

- a. "A*" represents AM and "P*" represents PM.
- b. Confirmed.
- c. – d. See the response to DBP/USPS-116 above.
- e. – g. The Postal Service does not maintain this information in the format requested.
- h. This is not a nationwide service available to every post office.

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

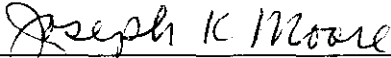
DBP/USPS-120 Please refer to your response to DBP/USPS-16 subpart f. [a] Please confirm, or explain if you are unable to do so, that if I were to mail a PO-Addressee Express Mail article under the same conditions as noted on a Saturday and which is destined to an office that is not on the overnight list, it would be guaranteed for delivery on Monday. [b] Please confirm, or explain if you are unable to do so, that if I were to mail both a PO-PO and a PO-Addressee article on a Monday of a non-holiday week between the same two points, both would be guaranteed for delivery on Wednesday. [c] Since it is possible to have PO-Addressee mail sent on Saturday arrive in time for a timely Monday delivery and since if a weekend is not involved both will be delivered on the second calendar day, please explain the reasons for your response to the scenario presented in subpart f of the original interrogatory.

RESPONSE:

- a. The service guarantee offers second day delivery service in the scenario described. Therefore, the guarantee would provide for Tuesday delivery.
- b. Depending on the Zip Code pairs, this could be the case if both items were guaranteed for second day service.
- c. The guarantee is for next day delivery or second day delivery. The answer provided in response to DBP/USPS-16(f) was addressing the scenario described in that particular case.

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.



Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 16, 2002