

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-156-165]

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.

January 17, 2002 Respectfully submitted,

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

DBP/USPS-156 Please refer to your response to POIR No. 5 - Question 8 as corrected on January 11, 2002. It is noted that the original response to subparts d and e were by air transportation via FedEx through their Memphis Hub and the corrected response is now by USPS surface transportation. [a] Does this represent a change in the method of transportation between the two pairs of offices or does it represent a correction to the original answer. [b] If it represents a change in the method of transportation, provide the date the change became effective and the reasons for the change [separately for subparts d and e of the original response]. [c] If it represents a correction to the original answer, was the mail ever transported by FedEx air via the Memphis hub as noted and provide the dates of such transportation [separately for subparts d and e of the original response].

DBP/USPS-157 Please refer to your response to DBP/USPS-130. [a] Please confirm, or explain if you are not able to do so, that the addressee has no involvement in the processing of the return receipt. [b] Please confirm, or explain if you are not able to do so, that the addressee does not even see the return receipt. [c] Please confirm, or explain if you are not able to do so, that the return receipts are processed prior to the control of the mail being transferred to the addressee. [d] At what physical location does delivery of the accountable mailpiece take place [namely, the transfer of control from the USPS to the

addressee]? [e] Please advise the specific actions that are taken in processing the accountable mailpiece starting at the time that the return receipt is removed and ending when the transfer of control to the addressee takes place. [f] Please advise the approximate time [provide a minimum and maximum time period if necessary to provide a responsive answer] between the time that the return receipt is removed and the transfer of control to the addressee takes place. [g] Please confirm, or explain if you are not able to do so, that if an accountable mailpiece were to be “lost” by the Postal Service from the time that the return receipt is removed and the time the transfer of control is made to the addressee, that the sender of the mail would have a return receipt indicating that the article had been delivered to the addressee [even though it had not been]. [h] Please confirm, or explain if you are not able to do so, that this procedure does not provide the sender of the mailpiece with evidence of delivery of the mailpiece to the addressee. [i] Please confirm, or explain if you are not able to do so, that this procedure is designed to provide a convenient way to ensure that the return receipts are returned to the senders even though it does not provide the required evidence of delivery.

DBP/USPS-158 Please refer to your response to DBP/USPS-138. [a] Please confirm, or explain if you are not able to do so, that the addressee will be presented with a pile of PS Form 3811's for completion without the mailpieces that they were associated with. [b] What method is used by the addressee to complete the return receipt form and provide a sample of information as to the type of completion? [c] Does an employee of the addressee personally perform that action? If not, who does?

DBP/USPS-159 Please refer to your response to DBP/USPS-115 subpart a. Please confirm, or explain if you are not able to do so, that Express Mail may be tendered at a service window at any time that the window is open for service and that if it is presented on Monday prior to the established cutoff time, it will be scheduled for delivery on Tuesday at the overnight area and on Wednesday at all other facilities in the country; if it is presented on Monday after the established cutoff time, it will be scheduled for delivery on Wednesday throughout the country; furthermore, there will be a reasonable time between the opening of the service window and the established cutoff time to allow for Express Mail to be deposited to achieve the overnight service to the overnight area.

DBP/USPS-160 Please refer to your response to DBP/USPS-115 subpart b. This information is obviously available to the United States Postal Service. Please provide the requested information or indicate that there are no facilities that meet the criteria.

DBP/USPS-161 Please refer to your response to DBP/USPS-118 subparts a through d. [a] Please confirm, or explain if you are not able to do so, that it has always been the policy of the Postal Service, since the establishment of Express Mail service, to allow for avoiding a failure on mail addressed to a post office box by placing a notice in the box even though the addressee does not have access to the box at that time [or to obtaining the article assuming that access to the box is available to obtain the notice in the box but there is no posted provision for obtaining the article from an on duty, but inaccessible, employee] and therefore can not receive physical delivery by the guaranteed service standard. [b] Provide copies of all regulations, memoranda, directives, etc. which support this action. [c] Please respond to subparts a and b of this interrogatory as they apply to delivery of mail addressed to General Delivery.

DBP/USPS-162 Please refer to your response to DBP/USPS-119 subpart a. [a] What specific time does A* and P* represent? [b] Please explain how there can be Post Office to Post Office - Express Mail which has a PM delivery time when DMM Section E500.5.4 and 6.4 indicate that there is only a 10 AM available for claim time. [c] Please explain how there can be Post Office to Post Office - Express Mail which has a PM delivery time in light of your confirmation of DBP/USPS-119 subpart b.

DBP/USPS-163 Please refer to your response to DBP/USPS-119 subparts c and d. [a] Am I to understand that the network can not support delivery of PO-PO Express Mail from, for example, an originating ZIP Code of 10036 [Times Square Station in midtown Manhattan] to a destinating ZIP Code of 10001 [General Post Office in Manhattan some ten blocks away] by 10 AM the following morning while it can achieve it to a destinating ZIP Code of 90049 [Los Angeles] by 10 AM the following morning? [b] Please explain why the network can not support delivery of PO-PO Express Mail to the specific destinating ZIP Codes referred to in DBP/USPS-119 subpart d. [c] Please reanswer DBP/USPS-119 subpart c in light of the ability for the network to obviously be able to provide the service between certain origin-destination points.

DBP/USPS-164 Please refer to your response to DBP/USPS-119 subparts e through g. [a] Please explain why the answer to subpart e cannot be obtained by just counting the number of 3-digit prefixes that appear on the attachment to the response to DBP/USPS-16? [b] Please explain why the answer to subpart f cannot be obtained by taking the response to the first part of this interrogatory , dividing it by the total number of 3-digit ZIP Code prefixes that are in use, and multiplying that result by 100. [c] Please explain why the Postal Service is not aware of the use made of ZIP Code prefix 733 [it appears to be the IRS in Austin TX unique ZIP Code] and therefore, knows that there are no delivery facilities under that prefix for pick-up of PO-PO service. [d] Please reanswer the original subparts e through h in DBP/USPS-119.

DBP/USPS-165 Please refer to your response to DBP/USPS-120 subpart a. [a] Please clarify your response. If I were to mail PO-Addressee Express Mail from Englewood NJ 07631 to Rapid City SD 57701 which is listed as a second day delivery area, and I mail it on Monday it will be guaranteed for delivery on Wednesday; Tuesday on Thursday; Wednesday on Friday; Thursday on Saturday; Friday on Sunday and Sunday [assuming I take it to the AMF in Newark which is open and does have the same 2-day standard for Rapid City] on Tuesday, but if I mail it on Saturday it will not be delivered until Tuesday or three days later. [b] Label 11-B only has a space for Day of Delivery [other than Military] as "Next" or "Second". How would this third day of delivery be indicated? [c] Does this same procedure apply for PO-Addressee articles mailed to an overnight area on a Saturday that they will be guaranteed for a Monday delivery? [d] Does this same procedure apply for PO-Addressee articles mailed to an overnight area on a Sunday that they will be guaranteed for a Tuesday delivery? [e] Please reanswer the original three subparts of DBP/USPS-120.

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 January 17, 2002
