

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-150-151, and 153-154)

The United States Postal Service hereby provides the response to the following interrogatories of David B. Popkin: DBP/USPS-150-151, and 153-154, filed on January 10, 2002.

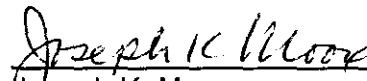
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Rate-making

  
\_\_\_\_\_  
Joseph K. Moore

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January 23, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-150** Please refer to your response to DBP/USPS-99 subpart c. [a] This interrogatory subpart does not ask what the intention of the wording is; only what the wording states. Please respond to the question that was asked. [b] What is the intention of the wording? [c] Provide details on how a reader of the wording will be aware of the intention.

**RESPONSE:**

- a) The DMCS does not prescribe the minimum delay that constitutes a delay for purposes of the application of the limitation.
- b) To deal with rare situations in which delay of Express Mail is caused by matters beyond the control of the Postal Service.
- c) The label and the DMM.

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**DBP/USPS-151** Please refer to your response to DBP/USPS-99 subpart h. [a] This interrogatory subpart does not ask what the intention of the wording is; only what the wording states. Please respond to the question that was asked. [b] What is the intention of the wording? [c] Provide details on how a reader of the wording will be aware of the intention.

**RESPONSE:**

- a) Not confirmed.
- b) To deal with extraordinary circumstances beyond the control of the Postal Service where there are delays in Express Mail occasioned by the breakdown in transportation networks. For example, the grounding of air transportation after the September 11 attacks could be an example of a breakdown in a transportation network.
- c) The label and the DMM.

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**DBP/USPS-153** Please refer to your response to DBP/USPS-103 subpart c. I have measured a number of envelopes that I have in the 6-3/4 and 10 size and find that a number of them have a thickness of less than 0.009 inches [from 0.005 inches for an air mail type envelope to 0.006 inches for a window envelope at the window to 0.008 inches for a bond envelope to 0.0085 inches for a #10 envelope] in the thinnest part of the envelope [where there is only two layers of paper or where there is one layer of paper and one layer of window material or even where there is one layer of paper in the case of a window envelope without any window material]. Based on your response, it would appear that virtually all normal envelopes will require payment of the surcharge since there will be some small part of the envelope where there is no enclosure or perhaps the envelope is even being mailed without an enclosure. [a] Is this the intention to require payment of the nonmachinable surcharge as noted above? [b] Confirm, or provide the corrected thickness, that the thickness of the prestamped envelope sold by the Postal Service has a thickness of less than 0.009 inches when measured at a point where there is only two layers of paper [in a regular prestamped envelope] and where there is one layer of paper and one layer of the clear window material [in a prestamped window envelope].

**RESPONSE:**

The intent of this *non-machinable* criterion is to surcharge flimsy pieces that would likely be damaged during automated processing and therefore must be processed manually.

- a. No. Though possible that certain letters could have a thickness of less than 0.009 inches, for example, at the edges, these envelopes with contents should meet the thickness criterion over a majority of the surface and therefore would not be assessed the surcharge.
- b. Confirmed.

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**DBP/USPS-154** Please refer to your response to DBP/USPS-103 subpart f. Please clarify your response. Would the "bulky key" as noted in your response still require the surcharge if it was firmly affixed to a piece of cardboard and the mailpiece still had a thickness of less than 0.25 inches?

**RESPONSE:**

Yes. Though the piece is less than 0.25 inches thick, a firmly affixed bulky key would still result in a piece non-uniform in thickness and create difficulties in both mail processing and delivery.

**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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January 23, 2002