Postal Rate Commission
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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

EXPERIMENTAL PRIORITY MAIL FLAT=RATE BOX, 2004 — Docket No. MC2004-2

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-T2-1-11]

June 4, 2004

I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 dated May 19, 2001, are incorporated herein by reference.

Respectfully submitted,

June 4, 2004 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-T2-1 On Page 3 Line 24 of your testimony, you indicate that contract postal units will find it easier to offer Priority Mail to their customers. [a] Do contract postal units provide identical retail mail acceptance services which are similar to "regular" postal facilities? [b] If not, explain the differences. [c] Do you feel that "regular" postal facilities will also find it easier to offer Priority Mail to their customers? [d] If not, why not?

DBP/USPS-T2-2 Between Page 4 Line 21 and Page 5 Line 1 of your testimony, you indicate the outside and inside dimensions of the two proposed Flat-Rate Boxes. The difference between the outside and inside dimensions of the same dimension varies between 0.25 and 0.75 inches. [a] What is the thickness of the box? [b] Please explain why there is a variation of between 0.25 and 0.75 inches between the outside and inside dimensions.

DBP/USPS-T2-3 On Page 5 Lines 4 and 5 of your testimony, you indicate that the proposed Flat-Rate Boxes have a similarity to the currently available Priority Mail corrugated boxes. [a] With respect to all of the currently available Priority Mail boxes, please provide the following information: [1] outside dimensions [2] inside dimensions [3] type and thickness of the box material [4] weight of the empty box. [b] Please indicate which of these boxes are the ones that are similar to the proposed Flat-Rate Boxes. [c] Please explain any differences in dimensions or characteristics between the currently available boxes and their similar proposed Flat-Rate Box. [d] What is the weight of each of the two empty proposed Flat-Rate Boxes?

DBP/USPS-T2-4 On Page 6 Lines 1 to 5 of your testimony, you indicate the printing of the boxes. Please provide a copy or indication of the printing that will appear on each of the six faces of both of the sizes of boxes of both the currently available Priority Mail similar boxes and the proposed flat-rate boxes.

DBP/USPS-T2-5 On Page 6 Lines 12 to 22 of your testimony, you indicate that the Flat-Rate Boxes will be widely available. [a] Is it the intention of the Postal Service to have the availability of the proposed Flat-Rate Boxes in a manner that is equivalent to the availability of the non-flat-rate boxes that are similar in size? [b] If so, please explain the methods and directives that will be utilized to achieve this result and the evaluations that will be made to ensure continuing compliance. [c] If not, why not?

DBP/USPS-T2-6 On Page 7 Lines 9 to 11 of your testimony, you indicate that the proposed $7.70 rate can be exactly paid by utilizing two of the current $3.85 stamps issued for the base Priority Mail service. [a] In evaluating the proposed rate for the Flat-Rate Box, what weight was provided to the ultimate decision to allow for the payment of postage in this manner? [b] Neglecting this "simple and convenient" way to pay the postage, what would the proposed rate have been?

DBP/USPS-T2-7 Between Page 7 Line 14 and Page 8 Line 3 of your testimony, you indicate how mailers will enter these Flat-Rate Boxes into the mail

stream. [a] Will either or both of the proposed Flat-Rate Boxes fit into a standard blue collection box? [b] If either or both will fit into a standard blue collection box, confirm that a mailer utilizing stamps to pay the postage will have to be able to determine that the box weighs less than 16 ounces before mailing the box in this manner and therefore would be paying an extra $3.85 in postage for the convenience of utilizing a Flat-Rate Box. [c] If a mailer is required to bring the box to a retail window at a post office because it weighs over 16 ounces, confirm that a mailer would have very little incentive to utilize the Flat-Rate Box in those instances where the postage rate exceeds the regular Priority Mail rate. [d] Please explain why the return address on a package must match the location of the pick-up by a Postal Service letter carrier. [e] Please confirm that the requirements of subpart d mean that a mailer may not use their home address for mail picked up at their work location or vice versa or that they may not mail a package for a neighbor, relative, or friend [at a different return address]. [f] Please confirm that a mailer who brings a box to a retail window at a post office because it weighs over 16 ounces may utilize any valid return address. [g] Please explain any items you are not able to confirm.

DBP/USPS-T2-8 [a] Will mailers be able to utilize the on-line Postal Service website to prepare Priority Mail labels for mailing Flat-Rate Boxes? [b] If so, will those boxes be able to be mailed in a blue collection box? [c] If not, why not?

DBP/USPS-T2-9 [a] Confirm that the basic convenience factor for the use of the Flat-Rate Box stems from three items, namely, that, #1 - the mailer does not have to weigh the parcel; #2 - the mailer does not have to determine the zone for the parcel; and #3 the mailer does not have to calculate the postage for the given weight and zone. [b] Please confirm that a mailer utilizing the on-line Postal Service website will have the zone and postage calculated [assuming the weight of the parcel was known]. [c] Please explain any items you are not able to confirm.

DBP/USPS-T2-10 On Page 3 Line 16 you indicate that the Priority Mail Flat-Rate Envelope has been in use since 1991. [a] Please confirm that the current postage

rate for a Priority Mail Flat-Rate Envelope is the minimum Priority Mail postage rate and therefore a mailer can never end up paying a higher postage rate [when compared to the non-flat-rate postage rate] by utilizing the Flat-Rate Envelope. [b] Please confirm that the current postage rate for a Express Mail Flat-Rate Envelope is the minimum Express Mail postage rate and therefore a mailer can never end up paying a higher postage rate [when compared to the non-flat-rate postage rate] by utilizing the Flat-Rate Envelope. [c] Please confirm that a mailer will end up paying a higher postage rate when utilizing a Flat-Rate Box [when compared to the non-flat-rate postage rate] in those instances when the weight of the parcel is less than 8 pounds for up to Zone 3; less than 4 pounds for Zone 4, less that 3 pounds for Zones 5 and 6, and less than 2 pounds for Zones 7 and 8. [d] Please explain any items you are not able to confirm.

DBP/USPS-T2-11 [a] Please confirm that for the rates that were in effect on June 1, 2002, the rate for a Priority Mail Flat-Rate Envelope was the 2-pound rate and when the Flat-Rate Envelope was utilized for weights under 16 ounces, the mailer was required to pay a higher postage rate [when compared to the non-flat-rate postage rate]. [b] Please confirm that on June 1, 2002, the Postal Service made both a flat-rate and a non-flat-rate Priority Mail envelope available to mailers and that these envelopes were identical in size and construction and had some similarity in design. [c] Please provide copies of the front and back of these two envelopes. [d] Was it the intention of the Postal Service to have both of these envelopes [flat-rate vs. non-flat-rate] equally available to the public? [e] If not, why not? If so, provide copies of any directives that were issued during the period of that rate to explain the two types of envelopes and the need for similar availability. [f] What publicity was provided to explain to the public that they could save money by utilizing the non-flat-rate envelope for mailings under 16 ounces or any other related information to the flat-rate envelope? [g] Please explain any confusion you believe resulted by having a flat-rate postage that was more than the minimum postage rate [such as existed on June 1, 2002 with the Priority Mail Envelope]. [h] Do you feel a similar confusion could result with the proposed Flat-Rate Box rate? [i] If no, why not? If so, what steps does the Postal Service plan to eliminate the confusion. [j] Please explain any items you are not able to confirm.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

June 4, 2004 David B. Popkin