

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Priority Mail Flat-Rate Box)

Docket No. MC2004-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DANIEL J. BARRETT (OCA/USPS-T2-2-7)
June 22, 2004

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-16 dated June 18, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-2. At pages 7-8 of your testimony, you state:

These items must be entered at the post office, or may be picked up by a Postal Service letter carrier from the home or place of business if the customer is a 'known mailer' and the return address on the package matches the location of pick-up.

- a. Has the Postal Service published any official rules or regulations (e.g., in the Federal Register) defining which individuals are "known mailers" and which are not? If so, please provide the date and location of publication.
- b. Has the Postal Service published any guidelines in the Postal Operations Manual on how to determine whether an individual is a "known mailer"? If so, please provide a publication date and cite for this information. Also, provide a copy of the new material.
- c. Has the Postal Service circulated any internal memoranda to retail offices and carrier offices defining or describing who is a "known mailer?" If so, please provide a copy of such memoranda, the author's name and position, the date the memoranda were circulated, and the locations where the memoranda were circulated.
- d. Are there restrictions against mailers who are not "known" from entering mail at a postal retail counter? If so, what are these restrictions.
- e. Must an individual who enters Priority Mail at a retail counter show personal identification before the mailpiece will be accepted? Please explain.

OCA/USPS-T2-3. Please confirm that the Postal Service has launched a program to install self-service package mailing centers at many postal retail facilities.

- a. What is the name of this program and what is the name for such centers?
- b. Will it be possible for mailers who are not "known" to postal employees to mail Priority Mail packages at such centers?
- c. Will it be necessary for mailers at the self-service centers to show personal identification?
- d. Please relate how extensive the placement of these self-service package centers will be, e.g., will every retail facility have one? If not, what percentage of postal facilities are planned to have such self-service centers?

OCA/USPS-T2-4. At page 8 of your testimony you state that:

While the Flat-Rate Box offers convenience as described in my testimony, it will be subject to the same security guidelines that apply to the mailing of other Priority Mail packages.

Please describe in detail the security guidelines that apply to the mailing of other Priority Mail packages. Also explain how these guidelines will be applied to the mailing of Priority Mail Flat-Rate packages.

OCA/USPS-T2-5. At page 7 of your testimony you state that Priority Mail Flat-Rate packages "may be picked up by a Postal Service letter carrier from the home or place of business." Please state whether the following pickup methods will be available for Priority Mail Flat-Rate packages:

- a. Free Carrier Pickup for "Requests . . . received by 2:00 AM CST." See <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa> and <http://www.usps.com/pickup/>
- b. Pickup on Demand. See <http://pickup.usps.com/pickup/>
- c. Are there any other pickup options besides those listed parts a. and b. of this interrogatory?
 - i. If so, please explain what the other pickup options are.
 - ii. Is there a name for this option? If so, please state the name.
- d. Please confirm that the Postal Service charges \$12.50 for Pickup on Demand (cited in part b. of this interrogatory), but that no charge is imposed for Carrier Pickup (cited in part a. of this interrogatory). If you do not confirm, explain why not.
- e. With respect to zone/pound-rated Priority Mail, what types of postage checks do carriers make under the free Carrier Pickup service?
- f. With respect to zone/pound-rated Priority Mail, what types of postage checks do carriers make under the Pickup on Demand service?
- g. Describe generally where and how postage checks are made for zone/pound-rated Priority Mail that is picked up by a carrier. In this description, state the role (if any) of postal clerks.

OCA/USPS-T2-6. Please confirm that free Carrier Pickup, requested online at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>, was launched on Sunday, February 1, 2004, in selected locations.

- a. If you cannot confirm, please state any additional facts that would make the statement correct.
- b. Also, please provide a copy of the Postal Service's public and internal announcements of the new pickup service.
- c. Please state whether the free Carrier Pickup service cited above is available in all ZIP codes across the nation. If not, which ZIP codes cannot use this service?
- d. If some ZIP codes are excluded from participation, what are the criteria for inclusion/exclusion?
- e. Please confirm that the Carrier Pickup service cited above was not available at the time that Docket No. R2001-1 was filed by the Postal Service with the Postal Rate Commission. If you cannot confirm, please explain why not.
- f. Please confirm that the Postal Service indicated nowhere in its filings in Docket No. R2001-1 that the Carrier Pickup service cited above would be available at a future date. If you do not confirm, provide cites to the Postal Service's Docket No. R2001-1 filing that refer to the new Carrier Pickup service.
- g. Please confirm that, in its Docket No. R2001-1 filing, the Postal Service did not explicitly account for the differences in cost that might arise from the Carrier Pickup service cited above. If you do not confirm, provide cites to all documents filed by the Postal Service in Docket No. R2001-1 that explicitly account for the Carrier Pickup service costs.
- h. Prior to implementation of the free Carrier Pickup service cited above, what methods of entry into the postal system for Priority Mail packages, by means of postal carriers, were available to mailers? If free Carrier Pickup is not available

in all ZIP codes, then are the methods noted in the preceding sentence those that are (and will be) available during the period of the Flat-Rate Box experiment for ZIP codes not participating in free Carrier Pickup? Please explain.

OCA/USPS-T2-7. Please describe in detail how the Postal Service will inform mailers of the most advantageous rate available to them for Priority Mail boxes. Specifically, how will the Postal Service publicize that zone/pound-rated Priority Mail is cheaper for all 1- and 2-pound packages, and that it is cheaper for lower zones in the 3 – 7 pound tiers?