

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-T2-8-23)  
June 24, 2004

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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-T2-8. OCA received informal advice from the Postal Service recently that free Carrier Pickup service is defined in the DMM. Please provide a citation to any provisions of the DMM that indicate when and how free Carrier Pickup can be obtained.

OCA/USPS-T2-9. OCA received informal advice from the Postal Service recently that free Carrier Pickup service is defined in the POM.

- a. Please provide a citation to any provisions of the POM that indicate when and how free Carrier Pickup can be obtained.
- b. Also, please furnish as a library reference the most recent edition of POM issue 8. (At <http://www.usps.com/cpim/ftp/pubs/pub223/c26man.html> edition 7/02 is listed as the most recent version.)
- c. Is POM issue 8, edition 7/02, the most recent version? If not, what is the most recent version?

OCA/USPS-T2-10. Please confirm that DMM §D010 “describes what mail classes are available for pickup and situations when pickup service is not available. It also covers additional standards for on-call and scheduled services.” If you do not confirm, please explain why not.

OCA/USPS-T2-11. DMM §D010.1.5 refers to a fee for pickup service and a requirement that a customer sign Form 5541. Please furnish a copy of Form 5541 as a library reference.

OCA/USPS-T2-12. Please confirm that DMM §D010.2.2 states that:

“Pickup fees are listed in R100, R500, and R700. The customer is charged the required fee:

- a. Every time pickup service is provided, regardless of the number of pieces or combination of classes of mail.”

If you do not confirm, please explain why not.

OCA/USPS-T2-13. Please confirm that DMM §D010.2.3 states that:

“The customer is not charged the applicable fee for:

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- b. Express Mail, Priority Mail, or Parcel Post that is collected during a regular delivery stop or a scheduled stop to collect mail not subject to a pickup fee.”

If you do not confirm, please explain why not.

OCA/USPS-T2-14. Please confirm that “a regular delivery stop” for a curbside delivery made from a postal vehicle typically is effected by placing mail into the curbside box and does not involve exiting the vehicle. If you do not confirm, please explain why not.

OCA/USPS-T2-15. Please confirm that the free Carrier Pickup service accessed at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa> potentially includes having a carrier (who normally does not exit the postal vehicle used to make deliveries on a curbside route): (1) exit the vehicle, (2) walk a path to the door, (3) ring a doorbell or knock on the door, (4) wait for the mailer to answer the door, (5) wait for the mailer to retrieve the package (a Priority Mail flat-rate box, if the Postal Service’s request is approved), and (6) walk back to the vehicle. If you do not confirm, please explain why not.

OCA/USPS-T2-16. . Please confirm that “a regular delivery stop” for a clusterbox delivery typically is made at a central delivery location and does not involve driving or walking to individual homes or businesses to effect delivery. If you do not confirm, please explain why not.

OCA/USPS-T2-17. Please confirm that the free Carrier Pickup service accessed at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa> potentially includes having a carrier (who normally makes a customer’s mail delivery to a clusterbox): (1) drive a considerable distance from the clusterbox to the mailer’s residence or business, (2) exit the vehicle, (3) walk a path to the door, (4) ring a doorbell or knock on the door, (5) wait for the mailer to answer the door, (6) wait for the mailer to retrieve the package (a Priority Mail flat-rate box, if the Postal Service’s request is approved), (7) walk back to the vehicle, and (8) resume driving the route. If you do not confirm, please explain why not.

OCA/USPS-T2-18. Please confirm that the following would constitute the primary channels for entering single-piece Priority Mail flat-rate boxes into the mailstream:

- a. At a retail counter
- b. At a self-service retail center
- c. At an Automated Package Center
- d. By means of the \$12.50 Scheduled Pickup service
- e. By means of the free Carrier Pickup service accessed at

<https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>

- f. By means of carrier pickups that do not involve deviations from the normal delivery route, such as leaving a Priority Mail flat-rate box in a business mailroom, or in (or next to) a curbside mailbox.
- g. Please list any other channels that are likely to be used.
- h. For each of a. – g. above, rank them by likely cost to the Postal Service for each entry method. List the most costly method first, then in descending order to least costly. Please explain your reasoning for determining the relative cost positions. Include a discussion of the clerk or carrier activities associated for each method of entry.

OCA/USPS-T2-19. Please confirm that the following would constitute the primary channels for entering pound/zone-rated single-piece Priority Mail packages into the mailstream:

- a. At a retail counter
- b. At a self-service retail center
- c. At an Automated Package Center
- d. By means of the \$12.50 Scheduled Pickup service
- e. By means of the free Carrier Pickup service accessed at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>
- f. By means of carrier pickups that do not involve deviations from the normal delivery route, such as leaving a Priority Mail flat-rate box in a business mailroom, or next to a curbside mailbox.
- g. Please list any other channels that are likely to be used.

- h. For each of a. – g. above, rank them by likely cost to the Postal Service for each entry method. List the most costly method first, then in descending order to least costly. Please explain your reasoning for determining the relative cost positions. Include a discussion of the clerk or carrier activities associated for each method of entry.

OCA/USPS-T2-20. For the following methods of entering single-piece Priority Mail packages into the mailstream, please state whether you believe entering flat-rate boxes or pound/zone-rated packages is more expensive. Explain your reasoning and include a discussion of the activities involved for flat-rate boxes versus pound/zone-rated packages.

- a. At a retail counter
- b. At a self-service retail center
- c. At an Automated Package Center
- d. By means of the \$12.50 Scheduled Pickup service
- e. By means of the free Carrier Pickup service accessed at <https://carrierpickup.usps.com/cgi-bin/WebObjects/CarrierPickup.woa>
- f. By means of carrier pickups that do not involve deviations from the normal delivery route, such as leaving a Priority Mail flat-rate box in a corporate mailroom, or next to a curbside mailbox.
- g. Please list any other channels that are likely to be used.

OCA/USPS-T2-21. Is it possible for clusterbox recipients to leave Priority Mail packages in a locked area of a clusterbox for carrier pickup? If so, please explain how this arrangement works. If not, please explain why not.

OCA/USPS-T2-22. Will it be possible for mailers to leave Priority Mail flat-rate boxes in a locked area of all clusterboxes for carrier pickup? If not, please explain.

OCA/USPS-T2-23. Will high-volume mailers of Priority Mail be permitted to use flat-rate boxes? If so, please explain how the Postal Service will accommodate high-volume mailer requirements. If not, why not? If not, how will the Postal Service prevent high-volume use of the flat-rate option?