

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL PRIORITY MAIL FLAT-RATE
BOX, 2004

Docket No. MC2004-2

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-8-20)
(July 6, 2004)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to the following interrogatories, filed on June 22, 2004: OCA/USPS-T2-8-20. These interrogatories concern city carrier pickup services for Priority Mail and other classes of mail, including operational details of carrier collection activities and the relative costs of such activities.

The Postal Service's proposal in this docket is a limited, experimental addition to the existing Priority Mail rate schedule to include an additional flat-rate option for Priority Mail Parcels using specific, Postal Service-provided packaging. This rate for this proposal is derived from the existing weight-and-zone-based Priority Mail rate schedule, both to place the flat rate box on a consistent footing with the existing Priority Mail rates, and to reflect the fact that data and analysis currently are unavailable to permit an alternative pricing approach. The rate and classification proposed do not involve any

carrier collection activities unique to the proposed flat rate boxes, which are to be handled and collected similarly to other Priority Mail. Furthermore, the costs of specific carrier activities are irrelevant to the Postal Service's proposal, which is not based on any evaluation of Priority Mail costs. The subject matter of the OCA interrogatories here at issue, therefore, exceeds the scope of this proceeding. The Postal Service objects on grounds of relevance and scope, and intends to strenuously resist any attempt to expand the scope of this proceeding into an inquiry on overall Priority Mail rates and costs, or an investigation into the Postal Service's recent efforts to facilitate carrier collection of parcels. The individual interrogatories are discussed more specifically below.

Interrogatories OCA/USPS-T2-8 through 13.

These interrogatories request provision or confirmation of specific provisions of the DMM and/or POM that relate to carrier parcel collection service provided by the Postal Service and the regulations governing when such services are provided without additional charge. Since such collection services generally have little bearing on the limited proposal at issue in this case, and pertain to Priority Mail generally, and to other types of mail as well, the Postal Service objects on grounds of relevance and scope. Nevertheless, in an effort to keep this proceeding moving forward, the Postal Service, over objection, will provide responses to these questions. Such responses, however, should not be regarded as a waiver of our fundamental objection to expanding the scope of this proceeding beyond its appropriate bounds.

Interrogatory OCA/USPS-T2-14.

This interrogatory requests confirmation “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.” For the reasons stated previously, this interrogatory concerning carrier delivery operations (and, presumably, carrier collection costs) is beyond the scope of the Postal Service’s proposal in this case. The Postal Service objects on grounds of relevance and scope.

Interrogatory OCA/USPS-T2-15.

This interrogatory seeks confirmation “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.” This operational question, which relates to carrier collection activities involving collection of Express Mail and Priority Mail (and, possibly, other classes) generally, is, for the reasons stated above, beyond the scope of this proceeding and is objectionable on grounds of relevance and scope.

Interrogatory OCA/USPS-T2-16.

This interrogatory seeks confirmation “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.” This operational question, which relates to cluster box carrier delivery, involving all classes generally, is, for the reasons stated above, beyond the scope of this proceeding and is objectionable on grounds of relevance and scope.

Interrogatory OCA/USPS-T2-17.

This interrogatory seeks confirmation “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.” This operational question, which relates to carrier collection activities involving collection of Express Mail and Priority Mail (and, possibly, other classes) generally, is, for the reasons stated above, beyond the scope of this proceeding and is objectionable on grounds of relevance and scope.

Interrogatory OCA/USPS-T2-20.

This interrogatory reads:

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.

This question, which seeks an examination of the underlying mail acceptance costs for particular subsets of Priority Mail, is both beyond the scope of the Postal Service's proposal, but also unlikely to lead to the production of useful information. Because the Postal Service's proposal for a flat-rate box is not cost-based, the Postal Service has not examined the relative costs at issue in the interrogatory. The Postal Service objects on grounds of relevance and scope.

The Postal Service considered objecting to other operational questions in this set, such as Interrogatory 21, but, in order to advance the case, has refrained at this point. The Postal Service reserves the right, however, to, in future, object to operational

and costing questions outside the scope of its proposal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402

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.

Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
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