

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

EXPERIMENTAL PRIORITY MAIL FLAT-RATE  
Box, 2004

Docket No. MC2004-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DANIEL J. BARRETT TO INTERROGATORIES OF  
DAVID B. POPKIN (DBP/USPS-T2-20-27)  
(July 28, 2004)

The United States Postal Service hereby files the response of witness Daniel J. Barrett to the following interrogatories of David B. Popkin: DBP/USPS-T2-20-27, filed on July 13, 2004.

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, Ratemaking

\_\_\_\_\_  
Richard T. Cooper

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

RESPONSE OF POSTAL SERVICE WITNESS BARRETT  
TO DAVID B. POPKIN INTERROGATORIES

**DBP/USPS-T2-20.** In your response to DBP/USPS-T2-2, you indicated that a correction to your testimony would be filed shortly. Please advise when it will be made?

**RESPONSE:** I anticipate that these corrections will be filed in 1 to 2 days.

RESPONSE OF POSTAL SERVICE WITNESS BARRETT  
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**DBP/USPS-T2-21.** In your response to DBP/USPS-T2-11[c], you indicated that a copies of the envelopes would be filed shortly. Please advise when they would be filed.

**RESPONSE:** Please see the attached.

12-1/2 X 9-1/2 LXE  
PRINT SIDE

**FLAT RATE ENVELOPE**  
2 LB. POSTAGE RATE REGARDLESS OF WEIGHT  
DOMESTIC USE ONLY  
FOR PICKUP CALL 1-800-222-1811

DOMESTIC USE ONLY  
2LB. PRIORITY MAIL  
POSTAGE REQUIRED

**FLAT RATE ENVELOPE**  
2 LB. POSTAGE RATE REGARDLESS OF WEIGHT  
DOMESTIC USE ONLY



**PRIORITY MAIL**  
UNITED STATES POSTAL SERVICE®

[www.usps.com](http://www.usps.com)

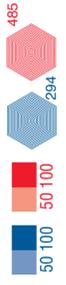
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*We Deliver To You.*



The efficient FLAT RATE ENVELOPE. You don't have to weigh the envelope...just pack all your correspondence and documents inside and pay only the 2 lb. Priority Mail postage rate.

- HOW TO USE:**
- 1. COMPLETE ADDRESS LABEL AREA**  
Type or print required return address and addressee information in customer block (white area) or on label (if provided).
  - 2. PAYMENT METHOD**  
Affix postage or meter strip to area indicated in upper right hand corner.
  - 3. ATTACH LABEL (if provided)**  
Remove label backing and adhere over customer address block area (white area).



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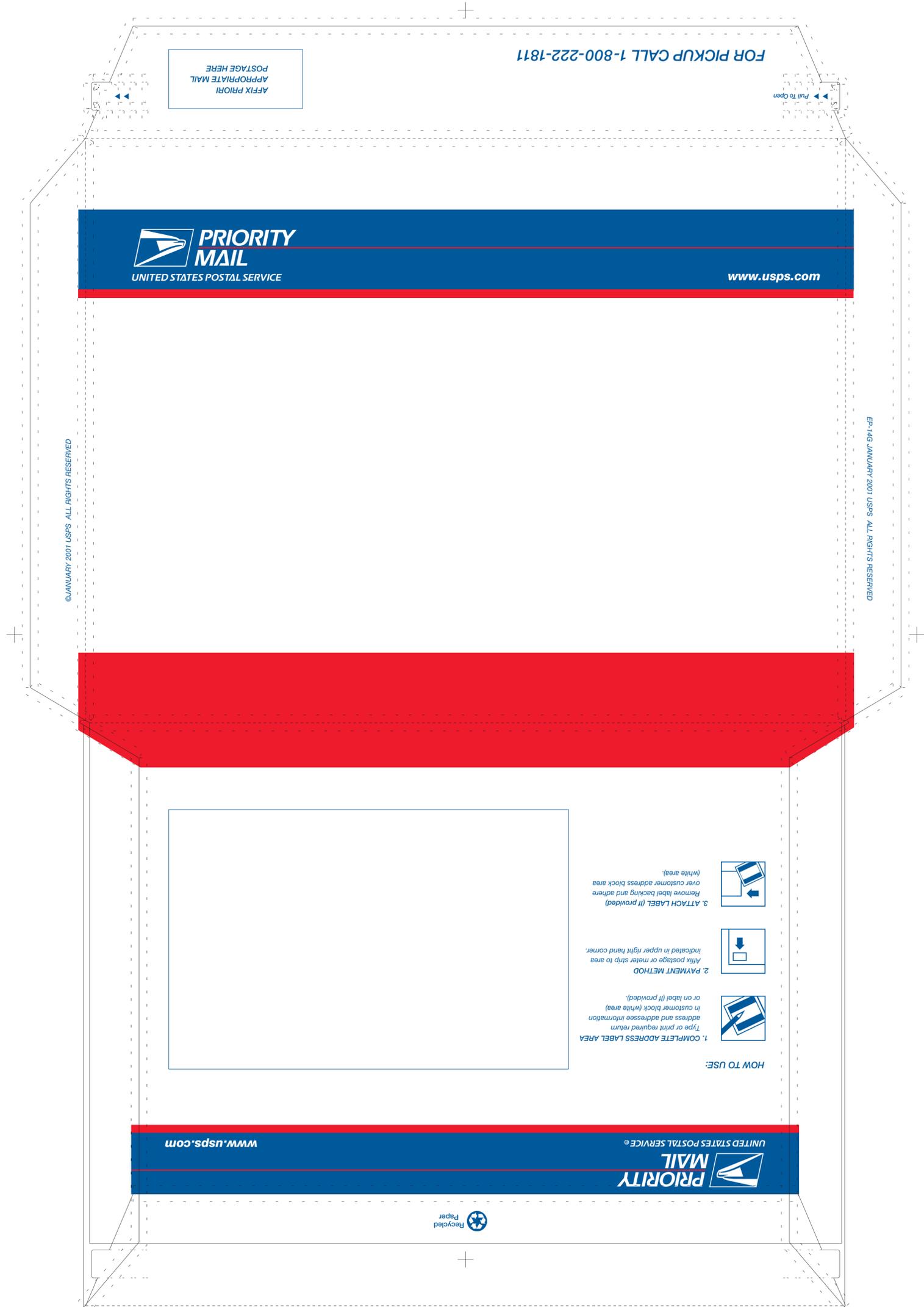
**FLAT RATE**



UNITED STATES POSTAL SERVICE®

[www.usps.com](http://www.usps.com)

USPS  
1# ENVELOPE  
12 X 9-1/8 X 1-3/4  
BLANK SIZE 19 X 13-3/4  
CAD#133500.CIM



RESPONSE OF POSTAL SERVICE WITNESS BARRETT  
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**DBP/USPS-T2-22.** Please refer to your response to DBP/USPS-T1-1. The confusion that took place after June 30, 2002 as discussed in the first paragraph of your response is a separate condition which was ultimately resolved by allowing any of the similarly sized envelopes to be treated as a flat-rate envelope. The condition that I am interested in is the one that relates to the entire rate period ending in June 2002. Since you do not know how widespread any such potential confusion may have been, please redirect this to the United States Postal Service for an institutional response from any qualified individual so long as they are aware of the condition [even if a "STUDY" has not been completed].

**RESPONSE:** I have spoken with a number of individuals involved with the program during this time period, and one was aware of anecdotal reports of some confusion regarding the uses of the different Priority Mail envelopes available at that time. Although this person did not know how widespread any such confusion may have been, one example of the confusion was uncovered. Specifically, a situation occurred in which a Priority Mail Flat-Rate envelope was deposited with postage reflecting not the flat rate (\$3.95), but the one-pound rate (\$3.50).

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**DBP/USPS-T2-23.** Please refer to your response to DBP/USPS-T1-5 subparts b, c, and d. The response that I am looking for in subpart b is the sources that an unsophisticated mailer would obtain the flat-rate box from the USPS. The response desired was an answer such as, from a post office window clerk, from a display in the post office lobby, by calling an 800 number, by making a request on the USPS website, etc. Please respond to my request as made in both subparts b, c, and d.

**RESPONSE:** “Unsophisticated” mailers, whoever they might be, will be afforded access to the Flat Rate Box items in the same manner as other mailers. As I have said in my direct testimony, at this time, the Postal Service plans to make the Flat-Rate Box packaging available via multiple channels including post offices and usps.com. Customers may also place orders via the supplies fulfillment center directly via phone, fax, or mail. This facility also fulfills orders placed via the Internet.

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**DBP/USPS-T2-24.** Please refer to your response to DBP/USPS-T2-14. You indicate that label DDD2 is inaccurate to allow for carrier pickup and is in the process of revision. [a] Why isn't label DDD1 similarly inaccurate? [b] When do you expect that either or both of these labels will be revised?

**RESPONSE:**

[a] DDD2 would appear to be inaccurate in suggesting "all Domestic Mail weighing 16 ounces or over that bears stamps and all international and military APO/FPO mail weighing 16 ounces or over MUST be presented to a retail clerk at a post office."

Pickup of domestic mail by the letter carrier at the home or place of business is acceptable, as established in the DMM Revision published in *Postal Bulletin 21930*.

DDD1 is not inconsistent with requirements for mail entry, though it directs the mailer to use one specific means of entry for mail of this type. I am informed that DDD1 is being reviewed at this time, as well.

[b] An internal discussion within the Postal Service is underway regarding the necessity for, and nature of potential revisions. The timing of finalized language and production of new labels, if necessary, has not yet been determined.

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**DBP/USPS-T2-25.** Your response to DBP/USPS-T2-17 related to confusion that may have existed on or around June 1, 2002. My interrogatory was for information that may have occurred at any time during the entire period that the rates that were in effect on June 1, 2002 existed. Please respond accordingly.

**RESPONSE:** My response was intended to describe conditions that existed during the entire period the rate was in effect, not simply the period on or around June 1, 2002. Therefore, I believe my original submission in response to DBP/USPS-T2-17 would be responsive here.

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**DBP/USPS-T2-26.** Please refer to your response to DBP/USPS-T2-16. Please advise the general make-up of the readership of the Mailers Companion.

**RESPONSE:** I am informed that the distribution list includes approximately 155,000 recipients, and is made up of business mailers and internal USPS personnel, for the most part. It is estimated that approximately 60-65% of subscribers are business mailers, with the remainder being postal employees.

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**DBP/USPS-T2-27.** Please refer to your response to OCA/USPS-T2-2 subparts d and e. You state that DMM E010 requires the mailer to provide identification when mailing an article. [a] Which specific subsection in DMM E010 contains this requirement? [b] Does this subsection apply to all classes of mail or is it limited to Overseas Military Mail only? [c] Please explain and provide a responsive answer to the original interrogatory.

**RESPONSE:**

[a] Section 1.6 "Restriction" outlines this possibility. Though the sender is not required to provide identification in all cases, he or she "*may*" be so required to do so.

[b] It is my understanding that this section applies to Priority Mail and single-piece rate Package Services.

[c] My original response was my best effort to answer the question posed by OCA. I do not believe my original answer was unresponsive, nor have I been advised that OCA believes such.

## **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  
July 28, 2004