

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

EXPERIMENTAL PRIORITY MAIL FLAT-RATE
Box, 2004

Docket No. MC2004-2

COMPELLED RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DANIEL J. BARRETT
TO OCA INTERROGATORIES (OCA/USPS-T2-14-18)
(August 10, 2004)

The United States Postal Service hereby files the response of witness Daniel J. Barrett to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-14-18, filed on June 24, 2004. These responses were compelled by Presiding Officer's Ruling No. MC2004-2/4.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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RESPONSE OF POSTAL SERVICE WITNESS BARRETT
TO OCA INTERROGATORY

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.

RESPONSE: Not confirmed. A “regular delivery stop” is for all types of mail, including mail that is larger than the mail receptacle or mail that requires a customer signature.

Delivery of this mail should not be viewed as “irregular” since it is a normal activity, although it does require exiting the vehicle.

RESPONSE OF POSTAL SERVICE WITNESS BARRETT
TO OCA INTERROGATORY

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.

RESPONSE: See the response to OCA/USPS-T2-14 regarding the characterization of a normal or "regular delivery stop." If the notification involves a package that will not fit in the mailbox, then the carrier will exit the vehicle to retrieve the package. It is possible that the six steps outlined here could occur.

RESPONSE OF POSTAL SERVICE WITNESS BARRETT
TO OCA INTERROGATORY

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.

RESPONSE: Not confirmed. Delivery of mail that requires a signature would be made at the door as stated in OCA/USPS-T2-14. Carriers may be required to go to residences or businesses to complete delivery, but this should not be considered “irregular”. Clusterbox units do have parcel lockers for oversize pieces; however, this does not remove the responsibility of signatures being required for some items at the time of delivery.

RESPONSE OF POSTAL SERVICE WITNESS BARRETT
TO OCA INTERROGATORY

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.

RESPONSE:

It is possible that the steps listed here could occur. See the response to OCA/USPS-T2-15.

RESPONSE OF POSTAL SERVICE WITNESS BARRETT
TO OCA INTERROGATORY

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.

RESPONSE:

- a.-g. Most parcels would be entered through these channels.
- h. This cost information is not available for the flat-rate box, which has not yet been introduced, so the requested ranking is not available. Beyond that, the Postal Service does not explicitly track the acceptance costs by shape for all of the individual channels listed. To the extent these costs are incurred, they show up in the volume variable costs through standard CRA methods.

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.

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August 10, 2004