

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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Postal Rate and Fee Changes]  
Pursuant to Public Law 108-18}

DOCKET NO. R2005-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-1 through 29]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

April 8, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-1 [a] Please provide a listing for each of the last three fiscal years showing the total number of collection boxes installed. [b] Please provide a breakdown, either by percentage or total number of boxes, in each of the following categories: Service Class, Type of Box, Location Type. [c] Please provide a breakdown of the percentage of boxes that have one or more collection times on a [1] Weekday, [2] Saturday, [3] Sunday, and [4] Holiday. [d] Please provide a listing for each of the last three fiscal years showing the total number of collection boxes that were added during that fiscal year. [e] Please provide a listing for each of the last three fiscal years showing the total number of collection boxes that were removed during that fiscal year.

DBP/USPS-2 [a] Please provide copies of any directives that have been issued at either the Headquarters level or at the Area level since the last rate case with respect to instructions or guidelines for either the times to be posted for collection boxes or for the addition or removal of collection boxes. [b] Please provide copies of any Inspection Service or OIG audits on collection service that have been conducted since the start of the last rate case.

DBP/USPS-3 [a] Please provide a listing for each of the last three fiscal years showing a breakdown of the final collection time for the day for each of the collection boxes on a weekday for each of the time periods [if percentages are provided, please round off to the nearest integer for percents greater than 3% and to the nearest 1/10 of a percent for percents less than 3%]:

- [1] 12:01 AM to 8 AM
- [2] 8:01 AM to 9 AM
- [3] 9:01 AM to 11 AM
- [4] 11:01 AM to Noon
- [5] 12:01 PM to 2 PM
- [6] 2:01 PM to 3 PM
- [7] 3:01 PM to 4 PM
- [8] 4:01 PM to 4:59 PM
- [9] 5 PM
- [10] 5:01 PM to 5:59 PM
- [11] 6 PM to 6:30 PM
- [12] 6:31 PM to 8 PM
- [13] 8:01 PM to 10 PM
- [14] 10:01 PM to Midnight

[b] Please provide a similar listing for the final collection of the day for Saturday broken down to the following time periods:

- [1] 12:01 AM to 8 AM
- [2] 8:01 AM to 10 AM
- [3] 10:01 AM to Noon
- [4] 12:01 PM to 1 PM
- [5] 1:01 PM to 3 PM
- [6] 3:01 PM to 4 PM

[7] 4:01 PM to 4:59 PM

[8] 5 PM

[9] 5:01 PM to 6 PM

[10] 6 PM to 8 PM

[11] 8:01 PM to 10 PM

[12] 10:01 PM to Midnight

DBP/USPS-4 Please provide a listing of all ZIP Code pairs that have changed their First-Class Mail service standards in the last three fiscal years broken down by category such as overnight to 2-day, overnight to 3-day, etc.

DBP/USPS-5 Please provide a listing of the EXFC results for the past four quarters showing the following categories: [a] Performance Center name [b] ZIP Codes [c] Overnight Percent on Time, [d] Overnight Percent on Time Margin of Error [e] Overnight Average Days to Deliver [f] Overnight Average Days to Deliver Margin of Error [g] 2-Day Percent on Time, [h] 2-Day Percent on Time Margin of Error [i] 2-Day Average Days to Deliver [j] 2-Day Average Days to Deliver Margin of Error [k] 3-Day Percent on Time, [l] 3-Day Percent on Time Margin of Error [m] 3-Day Average Days to Deliver [n] 3-Day Average Days to Deliver Margin of Error [o] Nation Percent on Time, [p] Nation Percent on Time Margin of Error [q] Nation Average Days to Deliver [r] Nation Average Days to Deliver Margin of Error.

DBP/USPS-6 With respect to the delivery standards / commitments for First-Class Mail, I am interested in obtaining the criteria that are utilized to determine whether a given path will be committed for overnight, 2-day, or 3-day delivery. [a] Confirm that for any given ZIP Code pair [other than the military ZIP Codes] will be committed for delivery in three days or less. [b] Provide copies of any directives and guidelines that are utilized to determine those areas that fall into any or all of those three categories. [c] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive overnight service. [d] Is the minimum area that is overnight an entire 3-digit ZIP Code prefix, namely, if A to B is overnight then it is also overnight to all facilities with the same 3-digit ZIP Code prefix as B? [e] If A to B is overnight, then will all offices that are served by the P&DC/P&DF serving B be overnight from A? [f] Must overnight service be reciprocal, namely if A to B is overnight, then B to A will also be overnight. [g] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive 2-day service. [h] Is the minimum area that is 2-day an

entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 2-day to all facilities with the same 3-digit ZIP Code prefix as B? [j] If A to B is 2-day, then will all offices that are served by the P&DC/P&DF serving B be 2-day from A? [j] If A to B is 2-day, then will all offices that are served by the ADC serving B be 2-day from A? [k] Must 2-day service be reciprocal, namely if A to B is 2-day, then B to A will also be 2-day. [l] Must all offices within a given state be overnight or 2-day from anywhere within the same state? [m] Must all adjacent ZIP Code areas be either overnight or 2-day service? In other words, any two neighbors may not have 3-day service between them. [n] Is the minimum area that is 3-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 3-day to all facilities with the same 3-digit ZIP Code prefix as B? [o] If A to B is 3-day, then will all offices that are served by the P&DC/P&DF serving B be 3-day from A? [p] If A to B is 3-day, then will all offices that are served by the ADC serving B be 3-day from A? [q] Must 3-day service be reciprocal, namely if A to B is 3-day, then B to A will also be 3-day. [r] Please indicate the guidelines that were utilized in Docket N89-1 along with any changes that have been implemented since then. In these guidelines, also indicate the minimum percentages of a facility's mail that would mandate a higher level of service. [s] Please discuss, explain, and provide appropriate data of any of the sub-parts d through q above that you are not able to provide an unqualified yes response.

DBP/USPS-7 [a] Confirm in general that air transportation will be more costly than surface transportation. [b] Confirm in general that air transportation will provide more expeditious service than surface transportation. [c] If not, explain. [d] Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part? [e] If not, why not and explain how the handling of this mail could be considered to be handled expeditiously. [f] Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service. [g] Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago. [h] Does the level to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service? [i] If not, explain how and why it does not.

DBP/USPS-8 In regard to the Service Commitments / performance goals for First-Class Mail, [a] do the delivery standards apply to all types of First-Class Mail regardless of whether it is a letter, card, parcel, flat, or other shape or type? [b] Do the delivery standards apply regardless of the method by which the article is addressed such as printed vs. handwritten? [c] Do the delivery standards apply regardless of whether the article has no ZIP Code or a 5- or 9-digit ZIP Code? [d] Do the delivery standards apply regardless of whether or not the article contains a 5-, 9-, or 11-digit barcode applied by the mailer? [e] Do the delivery standards apply regardless of any other services that are utilized such as Certified Mail, Registered Mail, COD, Insured Mail? [f] Do the delivery standards apply whether or not the postage is paid by stamps which require cancellation or by some other means, such as a postage meter, which does not require cancellation. [g] Are the EXFC results broken out by any sub-scores for different characteristics of mail as noted in subparts a through f above? If so, provide results for the most recent period. [h] Elaborate and explain any negative answers.

DBP/USPS-9 [a] Is mail addressed to a government agency in Washington DC [ZIP Codes 202 through 205] included in the EXFC results for Washington DC? [b] If not, why not? [c] Have any studies been completed in the past three years to evaluate the delivery service to these agencies? If yes, please provide copies. If not, why not? [d] What special methods, if any, are utilized to process mail to these agencies. [e] Is the Postmaster at Washington responsible for the delivery of mail to these agencies? If not, please provide the name, title, and address of the responsible individual.

DBP/USPS-10 [a] Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day? [b] Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day? [c] Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day? [d] Does this apply to all delivery dates including Saturday? [e] Explain and elaborate on any negative answers.

DBP/USPS-11 [a] Confirm,. or explain and discuss if you are not able to confirm, that the EXFC program has accomplished the following three results, [1] It has allowed the Postal Service to find the root causes for many of the items which delay the mail and correct them so

as to improve the service. [2] It has caused the Postal Service to engage in a high cost system for error correction. For example, before EXFC was in place, a post office receiving a quantity of mail for another office in error, just sent the mail back to the P&DC for delivery on the following day. Now the mail will be specially brought over to the other office so that it can be delivered on the scheduled day. and [3] It has caused post offices to come up with creative methods of manipulating the EXFC score such as a post office making collections before 5 PM at box locations that are mandated to be collected at 5 PM or later so as to achieve a better mail arrival profile at the P&DC and therefore improve the likelihood of a higher EXFC score. [b] Provide and explain any other benefits of the EXFC program. [c] Please discuss the extent to which a customer's mail service in an EXFC area will be different than that which would be received by a customer in a non-EXFC area.

DBP/USPS-12 [a] Please confirm, or discuss and explain if you are not able to confirm, that compensation for many Postal Service Installation Heads is affected by the EXFC results for their area of responsibility. [b] Other than the Installation Head [Postmaster / District Manager / etc.] provide a listing of the categories of Postal Service Managers whose compensation is affected by EXFC results. [c] Provide an explanation of the method by which the compensation is tied to the EXFC results. [d] Are all EXFC results utilized or is it limited to the overnight score only? [e] If only overnight, please explain why.

DBP/USPS-13 [a] Confirm, or explain and discuss if you are not able to confirm, that EXFC is a measurement for First-Class Mail only. [b] Confirm, or explain and discuss if you are not able to confirm, that all EXFC test mail is prepaid at the single piece rate and is deposited in collection boxes. [c] Confirm, or explain and discuss if you are not able to confirm, that EXFC pieces are not sent by any of the presorted / automation rates. [d] Provide the results of any studies that have been made showing the extent to which the delivery times of presorted / automation rate First-Class Mail is achieved. [e] Provide the results of any studies that have been made which would allow the EXFC results to serve as a proxy for the automated / presorted mail. [f] Does the EXFC program check all types of First-Class Mail / by shape such as letter, flat, SPR etc., / by method of addressing such as printed, typewritten, or hand written / by method of postage prepayment such as stamped or metered? [g] What percentage of the country's total mail volume [of EXFC type of mail] is tested by the EXFC program? [h] Does the EXFC program make an effort to sample the origin-destination pairs, shape, method of addressing, and method of postage prepayment in proportion to the volume

that exists within the entire universe? If not, why not. If so, provide copies of any study. If necessary, separate and discuss each separate criteria. [i] In the event that a post office wishes to eliminate collection from a collection box on a particular date and time, such as might occur on a holiday or a day surrounding a holiday, are they able to notify the EXFC contractor in advance so that they will not deposit EXFC mail for that omitted collection time [even though the box is posted with that time]? [j] If the response to subpart i is yes, please provide a listing of all instances in which this was done in the past year.

DBP/USPS-14 With respect to the EXFC Program, [a] please advise the ZIP Codes that have been added or subtracted since the last rate case.

DBP/USPS-15 [a] In those post offices that have City Delivery service, is it required to deliver mail six days a week [Monday through Saturday except legal holidays] at the following types of addresses: [1] City Delivery Route [2] Post Office Box [3] General Delivery [4] Rural Route [5] Highway Contract Route? Provide a regulatory reference which permits any negative responses. [b] Provide a similar response for post offices that do not have City Delivery service [Except, no response is needed for City Delivery routes]. Provide a regulatory reference which permits any negative responses. [c] If exceptions may be made to the level of service, advise the level of management required for approval.

DBP/USPS-16 [a] Confirm that Insured Mail does not receive any special security from the time that the mail is accepted until it arrives at the delivery office, namely, it is transported in a similar manner to the same type of mail without insurance. [b] Confirm that mail insured for \$50 or less does not receive any special security at the delivery office. [c] Confirm that it will not be possible to determine, with absolute certainty, the amount of insurance that has been purchased [any value from \$50.01 to \$5000] by examination of the article. [d] Explain and discuss any subparts you are not able to confirm.

DBP/USPS-17 In order to determine the value to the customer for the ease and use of the collection system for First-Class Mail and other categories that may be mailed in collection boxes, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following as it applies to post offices that have city delivery service:

a) Consistent with existing transportation, all collections should be made as late as possible.

- b) The specific requirements of the Postal Operations Manual must be complied with rather than a claim that collection times which do not meet these specific requirements are "consistent with the requirements of the local community" or reliance on another generalized claim.
- c) A collection box with a weekday 5 PM or later collection is required to be located at all post offices, branches, and stations.
- d) A collection box with a weekday 6:30 PM or later collection is required to be located all postal facilities that are in operation at that time.
- e) The Saturday collection is required at all 5 PM to 6:29 PM boxes at 1 PM or later and at all 6:30 PM or later boxes at 3 PM or later.
- f) All collections should be made as late as possible to meet the transportation. This applies to all collections on all days of the week. For example, if the transportation leaves a post office at 6:15 PM, the last collection in front of the post office should not be 5 PM but should be made some 15 to 20 minutes before the departure. This contemplates that the office is staffed and would not apply where the mail was picked up by a contractor from an "empty" post office.
- g) Residential collection boxes should be collected as late in the day as possible. While dedicated collection runs may be utilized, to have a letter carrier pass the box at a later time than shown on the collection box and not make the collection is not appropriate.
- h) Letter carriers should collect the residential collection box at the time that they return to the delivery unit if they pass the box or readily could pass the box on their return to the office. Carriers may collect boxes that are not on their route, if appropriate.
- i) The collection times should be staggered on collection routes so that the collection time shown on the label will be the latest possible time consistent with not being collected early. Residential boxes should be collected no earlier than 20 minutes prior to the collection. Time decal boxes should be staggered perhaps in even 5 or 10 minute intervals, particularly on the final collection of the day. Having all of the 5 PM boxes marked at 5 PM [when the actual collection time might be as late as 6 PM] is inappropriate. Likewise, having all of the residential boxes marked at the time that the letter carrier leaves the office is also inappropriate.
- j) In addition to the boxes at post office facilities, all boxes which develop an average of 100 pieces on a weekday must be collected at 5 PM or later. The 100-piece average is the sum of all collections made on a given day at all collocated boxes. Having multiple boxes at the

same location as well as having multiple collections prior to 5 PM is a reasonable likelihood that these boxes must be assumed to meet the 100-piece level.

- k) Within the city delivery area of a post office, a mailer should not have to travel more than one-half mile to a residential box and 2 miles to a time decal box.
- l) Saturday collections must be made from all collection boxes except those that may be in a locked building or facility and therefore not accessible by the collector. This includes boxes which are located in buildings that are accessible. The volume of mail developed on a Saturday does not eliminate the need for the collection.
- m) All collections which are shown on a collection box for a given day must result in the mail being dispatched on that day. This would mean that mail destined for the overnight area would be delivered on the following day, for the second day delivery area on the second day, etc.
- n) Collection boxes with Holiday collections should indicate what holidays it either applies to or does not apply to. This would not apply if collections are made on all holidays. Marking a box with a holiday collection time and then only collecting it on "minor" holidays is inappropriate.
- o) An accessible collection box must be located at all Processing and Distribution Centers that will be collected as late as possible. The earliest possible time would probably be just before the earliest possible time that the last mail arrives from the associated offices and completes the initial culling operation.
- p) All collocated boxes must be collected at all times that a collection is made from any of the boxes. If this would be service affecting, that should be noted on the collection label [for example, if the regular box was collected at 5 PM and 7 PM and the collocated Express Mail box was only collected at 5 PM because the 7 PM collection would not meet service standards, there should be a 7 PM collection made along with a remark that it may not meet service standards - otherwise a First-Class Mail letter mailed at 6 PM could be delivered prior to an Express Mail letter deposited at the same time]. An exemption to this might apply if an Express Mail box was being collected and transported directly to the Airport Mail Center without going through the P&DC.
- q) All mail which is collected by city delivery, rural, and HCR carriers must be dispatched to the P&DC on the day it was collected from the route and arrive at the P&DC to achieve the delivery standards related to the date the carrier collected the mail from the customer. This appears to be more of a problem on a Saturday. For example, if I were to give my letter carrier a letter on Saturday when he/she delivers mail to my house, that mail must be

processed by the P&DC on Saturday for delivery on Monday or Tuesday. This would also mandate a later collection time on Saturday at the box located in front of the facility that the carriers operate out of since their mail is being dispatched anyway.

- r) Collection "box" labels or other appropriate signs should be posted on lobby drops inside of a postal facility.
- s) The collection times for the lobby drop located inside a postal facility and for the collection boxes located outside of the same facility should be the same times. This removes the confusion that would exist if they were different and it meets the requirement that both be as late as possible. The only exception would be that the lobby drop's last collection should be shown as the closing time of the lobby if that is earlier than the outside time.
- t) Very clear signs should be required in those instances where window service is provided after the collection time for the final dispatch of the day.
- u) Time decals are required to be affixed on all boxes which have a 5 PM or later collection on a weekday.
- v) There are no restrictions about placing collection boxes in transportation terminals.

DBP/USPS-18 Provide copies of any guidance that has been provided to District Managers with respect to the applicability of the requirements for collection boxes at non-city delivery offices.

DBP/USPS-19 [a] Please explain why the regulations for having retail window service on Saturday at a post office [independent offices as opposed to a station or branch] require that the Postmaster demonstrate that there is a need for Saturday service rather than making a demonstration that it is not needed. [b] Provide copies of any Headquarters directives that have been furnished to the field with respect to whether or not Saturday window service should be provided.

DBP/USPS-20 To evaluate the level of service that is being provided at post offices on Saturday, particularly those which do not have retail window service that day, please confirm, or explain and discuss if you are not able to fully confirm and/or provide any change which will make the indicated statement correct, each of the following:

- a) If there are Post Office Boxes at the facility, the public must have access to them on a Saturday.

- b) This access must include the ability of picking up mail on Saturday which is not placed into the physical box, such as oversize or accountable mail and this is known on a formal basis to the public such as by the posting of a sign.
- c) If there is incoming mail to the facility on Saturday, this mail must be placed into the post office boxes on Saturday in a similar manner as it is on other days.
- d) Other delivery customers, such as city delivery, rural, HCR, and General Delivery customers, must have the ability to pick up mail on Saturday and the delivery notice, if any, must indicate this availability.
- e) A sign must be posted at the facility to indicate this availability to call for mail so that the customer will realize that while window service is not available, pick-up service is available on Saturday.
- f) All mail which is collected on Saturday by city delivery, rural, or HCR carriers from customers along their delivery routes will be dispatched to the P&DC for processing on Saturday?
- g) Customers who have a mail article weighing over one pound with the postage paid by means of postage stamps will have the ability to present the article at the Post Office for dispatch on a Saturday.
- h) Those facilities that do not have retail window service must post signs, visible from outside, advising customers where window service may be obtained?

DBP/USPS-21      May Express Mail [Next Day and Second Day Service] be mailed at all postal facilities within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2004 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military - main offices, stations, branches, rural carriers, and other points at which other classes of mail may be tendered - during their normal office hours? If not, provide any exceptions either by category or by specific office[s].

DBP/USPS-22      May Express Mail [Next Day and Second Day Service] be addressed to all valid addresses within all of the ZIP Codes listed on pages 11-34 through 11-36 of the 2004 National Five-Digit ZIP Code and Post Office Directory, other than the three specific ranges shown as military? If not, provide any exceptions either by category or by specific office[s].

DBP/USPS-23      [a] For each of the past five years, what were the total revenue and expenses for International Mail? [b] For each of the past five years, what were the total

revenue and expenses for the sale of Phone Cards and Money Cards? [c] For each of the past five years, what were the total revenue and expenses for the sale of the various items of merchandise?

DBP/USPS-24 With respect to the Philatelic Products, [a] for each of the past ten years, what were the total revenue and expenses amounts related to it? [b] With respect to revenue amounts, what methods are utilized to determine the division of stamp sales between those that will be utilized to pay for mailing as opposed to those that will not be utilized? [c] What are the goals of the Postal Service with respect to the profit levels to be achieved from the sale of Philatelic Products?

DBP/USPS-25 With respect to the delivery of Post Office to Addressee Express Mail, [a] Provide information on the percentage of articles that are delivered by the guaranteed delivery time. Provide records for the past year or more. [b] Confirm that only the mailer [and not the addressee] may make a postage refund claim for delivery made after the guaranteed time. [c] How many articles and what percentage are delivered later than the guaranteed time over the past year or more? [d] How many claims have been filed for return of postage for late delivery for the same time period as utilized in Subpart [c]? [e] Confirm that a mailer must take a specific action to determine that an Express Mail article was delivered late and that without this information will be unaware of the late delivery of the article. [f] Explain any reasons why the percentage of refunds is less than the total number of articles delivered late. [g] Please explain and discuss any subparts you are not able to confirm.

DBP/USPS-26 [a] What percentage of postal facilities that have post office boxes provide access to their box section 24 hours a day? [b] Confirm, or explain if you are unable to do so, that these facilities fall into both those that have an employee on duty at the facility and those that do not. [c] What percentage of the total number of post office boxes are accessible 24 hours a day? [d] Confirm that, as a minimum, the box section in a post office should be accessible to the public at all times that a postal employee is on duty at the facility [which in many cases will be greater than the normal hours of retail operation]. If you are unable to confirm, please explain and discuss and provide specific information as to why it cannot be accomplished. [e] Provide information on the reasons which would allow a postal facility to permit access to the post office box section during times when there are no postal employees on duty in the facility. [f] Please provide copies of any directives or instructions that have been

issued, if any, regarding the guidelines for determining whether a box section can be open when no postal employee is on duty.

DBP/USPS-27 [a] Confirm that both post cards and stamped cards may be mailed at the same 23-cent postage rate [proposed to be 24-cents]. [b] What is the average cost for acceptance, processing, and delivering a post card? [c] What is the average cost for acceptance, processing, and delivering a stamped card? [d] If separate data is not available, please explain why it is not collected. [e] Provide the existing and proposed cost coverage for the entire First-Class Mail card subclass and for the single-piece First-Class Mail card rates. [f] Confirm that, in general, the cost for handling post cards would be higher than for handling stamped cards. [g] Confirm that the following characteristics would tend to indicate that stamped cards would have a lower cost than post cards: they are more uniform in size, they are more likely to have a printed address, they normally utilize the entire front of the card for the address. [h] Confirm that the following characteristics would tend to indicate that post cards would have a higher cost than stamped cards: they vary in size [between the authorized limits], they tend to have a glossy surface - both on the front and particularly on the reverse side, they are more likely to be hand addressed, and the left side of the card is normally utilized for a message rather than an address. [i] Explain and discuss any subparts that you are not able to confirm.

DBP/USPS-28 Most of the rates charged by the Postal Service are weight related. In order to mail the article it may be necessary to affix various labels or other material to the article as well as affix stamps to cover the cost. Please advise whether the following items are included in the weight of the article in determining the proper postage [for example, a Return Receipt card weighs approximately 0.12 ounces]. [a] If I affix one to a 0.95 ounce letter do I pay the one ounce rate because of the original weight of the letter of 0.95 ounces or am I required to now pay the two ounce rate because of the new total weight of 1.07 ounces? [b] The postage stamp or stamps that are affixed to pay the postage. [c] A Certified Mail sticker. [d] A Delivery Confirmation sticker [e] An Insured Mail sticker [f] A Registered Mail sticker [g] An Express Mail address label [h] A C.O.D. Mail label [i] If your response to subparts c, d, e, g, and/or h is yes, am I permitted to remove the mailing receipt part prior to the weight being determined?

DBP/USPS-29 [a] Please confirm, or explain if you are unable to do so, that Express Mail rates used to be zoned rates based on the distance between the origin and destination. [b] Please confirm, or explain if you are unable to do so, that the present Express Mail rates are unzoned and are the same regardless of the distance between the origin and destination. [c] Please provide all of the reasons why the rate system was changed and level of significance for each of the reasons provided.

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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.

David B. Popkin      April 8, 2005

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