

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN [DBP/USPS-31-40]
(May 5, 2005)

The United States Postal Service hereby provides its responses to above-listed interrogatories of David Popkin, filed on April 21, 2005.

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

A partial objection to the following interrogatory was filed on May 2, 2005:

DBP/USPS-38. A response to interrogatory DBP/USPS-30 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-31. [a] Please confirm, or explain if you are unable to do so, that the size limits for all classes of mail, other than package services which is 130 inches length plus girth, is 108 inches length plus girth. [b] For each of the classes which have a 108 inch limit, explain why the limit can not be raised above 108 inches and potentially to 130 inches.

RESPONSE:

(a) Not confirmed. The only type of mail having a size limit of 130 inches is Parcel Post.

Please refer to DMCS §§ 531 and 521.61.

(b) For all other subclasses of mail, either other limits apply or there is no demand.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-32 [a] Please confirm, or explain if you are unable to do so, that the Certified Mail Receipt PS Form 3800, Signature Confirmation Receipt PS Form 153, and Delivery Confirmation Receipt PS Form 152 will provide the same level of mailing receipt, if not a greater level of receipt since the article itself will be identified, that a Certificate of Mailing PS Form 3817 will provide. [b] Please confirm, or explain if you are unable to do so, that with the exception of Certified Mail which is limited to First-Class Mail, all four forms may be utilized on the same categories of mail [assume that if needed I insert a Styrofoam "peanut" in the envelope or package to ensure that the thickness will be 0.75 inches or greater].

RESPONSE:

[a] Not confirmed. The Certified Mail, Signature Confirmation, and Delivery Confirmation forms are not necessarily postmarked by a postal employee as a mailing receipt. Moreover, some customers may have a specific requirement to show evidence of mailing using Certificate of Mailing service.

[b] Not confirmed. Certified Mail, Delivery Confirmation, and Signature Confirmation services are not available on as many subclasses as Certificate of Mailing service. For example, Delivery Confirmation is not available for the First-Class Mail Cards subclass, and Signature Confirmation is not available for Standard Mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-33 [a] Please confirm, or explain if you are unable to do so, that when a mailer obtains a validated [with either the USPS datestamp and/or POS terminal validation] PS Form 3800, PS Form 153, PS Form 152, PS Form 3817, PS Form 3813/3813-P Insured Mail Receipt, or Label 11-B Express Mail at a Postal Service retail window, the mailer must actually turn over the mailpiece to the postal employee. [b] Please confirm, or explain if you are unable to do so, that the mailing receipt will show the date that the mailpiece was turned over to the Postal Service. [c] Please confirm, or explain if you are unable to do so, that, with the exception of PS Form 3813 [which shows the PO, State, and ZIP Code of the addressee], the receipts will show the name and address of the addressee. [d] May a mailer obtain a Postal Service dated PVI postage strip to attach to a mailpiece without actually turning over the mailpiece?

RESPONSE:

[a] Confirmed

[b] Confirmed, if by "mailing receipt" you are referring to the labels mentioned in part (a).

[c] Not confirmed. All of the labels, including PS Form 3813, have areas for the name and address of the addressee. The label will show the name and address of the addressee if the mailer fills them in.

[d] No.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-34 [a] Please confirm, or explain if you are unable to do so, that when a mailer utilizes an Automated Postal Center [APC] machine to mail Certified Mail, Delivery Confirmation Mail, Insured Mail, or Express Mail, the only "mailing receipt" that the mailer will receive will be the "credit card receipt". [b] Please confirm, or explain if you are unable to do so, that this mailer will be able to obtain this mailing receipt/credit card receipt whether they actually deposit the mailpiece in the mail or not. [c] Please confirm, or explain if you are unable to do so, that the mailing receipt/credit card receipt/postage stamp label will show the date of sale as opposed to the date the mailpiece was turned over to the Postal Service. [d] Please confirm, or explain if you are unable to do so, that the mailing receipt/credit card receipt will only show the ZIP Code of the addressee [the name, street address, city, and state of the addressee will not be shown].

RESPONSE:

[a] Confirmed, assuming that "credit card receipt" was intended to also include the receipt for transactions with debit cards.

[b] Confirmed.

[c] Confirmed.

[d] Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-35. For each of the categories of mail that contain a barcode, please provide the scans, if any, that are made at the office of mailing when the mailpiece is [a] mailed at a retail window [b] mailed in the APC collection drop [c] mailed in a lobby drop [d] mailed in a collection box [e] mailed with a paid pick-up service [f] tendered to a city delivery, highway contract, or rural letter carrier. [g] Please confirm, or explain if you are unable to do so, that for any scans made beyond the office of mailing, the method of mailing will have no effect.

RESPONSE:

- a. All barcodes on accountable mailpieces are scanned when the fee for the accountable mailpiece is paid at the retail window.
- b. Express Mail mailed at an Automated Postal Center (APC), and mail for which insurance over \$50 is purchased at the APC, are scanned at the office of mailing.
- c-f. Express Mail articles mailed in lobby drops, in collection boxes, mailed with a paid pick-up service, or tendered to a city delivery, highway contract, or rural letter carrier, are scanned at the office of mailing.
- g. The method of mailing does not influence any subsequent scans of the mailpiece.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-36. Does a parcel mailed at an APC and insured for \$50 or less receive a barcode and 20-digit number which would require signature at the time of delivery?

RESPONSE:

The APC shipping labels for packages insured for \$50 or less have "Insured" indicia and are not barcoded. A signature at delivery is not required.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-37. [a] Please confirm, or explain if you are unable to do so, that parcels mailed at an APC may not be sent by Media Mail, Library Mail, or Bound Printed Matter. [b] Please confirm, or explain if you are unable to do so, that this may result in a mailer eligible to utilize one of these three categories to pay a higher postage rate than would result by not utilizing the APC.

RESPONSE:

- a. Confirmed. Media Mail, Bound Printed Matter and Library Mail are not currently offered at APCs.
- b. Confirmed. The APCs were designed to accept the majority classes of domestic mail brought to the retail unit. Bound Printed Matter, Media Mail and Library Mail have content eligibility rules that are not easily presented or enforced at a self service.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-38. Please advise why the APC shows that the delivery standard for Parcel Post from Bergenfield NJ 07621 to Hyder AK 99923 is 35 days while the USPS Service Standards CDrom shows Standard Mail as only 10 days.

RESPONSE:

Official service standards for destinations outside of the contiguous forty-eight states do not exist. The 35 day estimated delivery time, not a service standard, displayed on the APC is based on the 3-5 week estimate used by the POS ONE system for destinations outside of the contiguous forty-eight states.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-39. [a] Please advise why the APC mailing receipt/credit card receipt for an Express Mail article does not show the time of mailing. [b] Please advise why the APC mailing receipt/credit card receipt for an Express Mail article does not show the scheduled date and time of delivery. [c] For Express Mail processed at an APC, will the time of mailing or the time that the article is logged in at the office of mailing determine the guaranteed delivery time? [d] Please confirm, or explain if you are unable to do so, that the APC computer screen will inform the mailer of the scheduled date and time of delivery.

RESPONSE:

- a. The time of mailing is not included on any APC receipts.
- b. The Express Mail service commitment is based on the physical acceptance of the article by the Postal Service rather than the time of the purchase.
- c. For an Express Mail article processed at an APC, the time the article is scanned at the office of mailing determines the guaranteed delivery time.
- d. Please see the answer to b.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-40. Please confirm, or explain if you are unable to do so, that when a mailer utilizes an Automated Postal Center [APC] machine to mail an article [assuming that it is over 16 ounces in weight] to which sufficient postage stamps to cover the required postage have already been affixed, the APC will "abort" the transaction and the mailer will be unable to mail the article.

RESPONSE:

Not confirmed. The APC queries whether or not postage is already affixed to the package and if the affixed postage is adequate for mailing the package the APC will not allow the customer to purchase additional postage. The APC does not abort the transaction; the APC asks the customer if they need additional services. The customer would not be prohibited from mailing the article.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX: -5402
May 5, 2005