

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-20-31)
(May 10, 2005)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-20. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning “identification of any performance goals,” and the chart entitled “United States Postal Service Service Standards.”

- a. Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, and 3rd Day First-Class Mail.
- b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

OCA/USPS-21. Please refer to DMM §133.2.1., January 6, 2005, which states, in part, “The USPS follows uniform guidelines for distributing and delivering mail but does not guarantee delivery within the specified time. Local postmasters can provide more information.”

- a. Please provide the “uniform guidelines for distributing and delivering mail.”
- b. Please discuss the phrase “delivery within the specified time.” What is (are) the “specified time” (or times) for First-Class Mail that is (are) not guaranteed?
- c. Please describe and discuss the information that can be provided by local postmasters.

OCA/USPS-22. Please refer to the ODIS Quarterly Statistics Reports filed with the Commission as LR-K-82, Tables 6 through 9. For each table, please provide comparable data from the EXFC.

OCA/USPS-23. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning “identification of any performance goals,” and the chart entitled “United States Postal Service Service Standards.”

- a. Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day Periodicals Mail.
- b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

OCA/USPS-24. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

- a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Periodicals Mail, and to the Periodicals Mail service standards referred to in response to interrogatory OCA/USPS-23, above. If you do confirm, please provide data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail.
- b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect

- to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail. If you do not confirm, please explain.
- c. Please explain how the Postal Service uses ODIS data to improve Periodicals Mail so as to achieve the Periodicals Mail service standards.
 - d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail referred to in response to interrogatory OCA/USPS-23, above.

OCA/USPS-25. Please refer to Attachment F to the Request, page 35, and the chart entitled "United States Postal Service Service Standards." In the column Mail Class, please confirm that "Standard B" refers to the four subclasses of Package Services Mail, namely Parcel Post, Bound Printed Matter (BPM), Media Mail, and Library. If you do not confirm, please explain.

OCA/USPS-26. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

- a. Please identify and describe the performance goals and/or service standards for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, and 9th Day separately for Parcel Post, BPM, Media Mail, and Library.
- b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

OCA/USPS-27. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, “The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set.” Also please refer to the paragraph at the bottom of page 35, where it refers to “[a]chieved levels of performance.”

- a. Please explain how the Postal Service uses ODIS data to improve Parcel Post, BPM, Media Mail, and Library so as to achieve the service standards for these Package Services subclasses.
- b. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, and 9th Day separately for the Parcel Post, BPM, Media Mail, and Library service standards referred to in response to interrogatory OCA/USPS-26, above.

OCA/USPS-28. Please refer to Attachment F to the Request, page 35, and the chart entitled “United States Postal Service Service Standards.” In the column Mail Class, please confirm that “Standard A” refers to the four subclasses of Standard Mail, namely Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route. If you do not confirm, please explain.

OCA/USPS-29. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning “identification of any performance goals,” and the chart entitled “United States Postal Service Service Standards.”

- a. Please identify and describe the performance goals and/or service standards for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and

10th Day separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route.

- b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

OCA/USPS-30. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

- a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Standard Mail, and to the Standard Mail service standards referred to in response to interrogatory OCA/USPS-29, above. If you do confirm, please provide data on the achieved levels of performance with respect to the for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route..

- b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards for Standard Mail. If you do not confirm, please explain.
- c. Please explain how the Postal Service uses ODIS data to improve Standard Mail so as to achieve the Standard Mail service standards.
- d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards for Standard Mail referred to in response to interrogatory OCA/USPS-29, above.

OCA/USPS-31. Please refer to the response of witness Lewis to interrogatory

VP/USPS-T30-3. Please provide a list and description of all systems of records maintained by the Postal Service from which the response can be extracted.