

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 B. POPKIN
(DBP/USPS-42-43, 45)
(May 13, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-42-43 and 45, filed on April 29, 2005. An objection to DBP/USPS-44(a) was filed on May 9, 2005. The responses to DBP/USPS-41 and 44(b)-(d) are forthcoming.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

DBP/USPS-42. Please refer to your response to DBP/USPS-16 subparts c and d.

- (a) Is it permissible for a customer to mail an article and overpay the postage?
For example, may I mail an article that requires \$10.00 in postage and pay for it by affixing a \$13.65 stamp?
- (b) If not, why not?
- (c) If so, please explain how it would be possible to determine, **with absolute certainty**, the amount of insurance that had been purchased.

RESPONSE:

(a) Yes.

(b) Not applicable.

(c) In the case of a package where postage was overpaid it would not be possible to determine with absolute certainty the amount of insurance that has been purchased unless the item was an unnumbered insurance item.

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DBP/USPS-43. Please refer to your response to DBP/USPS-25 subparts a and c.

- (a) Please breakdown the 2,329,666 failures into those that were scheduled for overnight delivery vs. those scheduled for delivery on the second day. If an accurate breakdown is not available, please provide the best estimate.
- (b) Please discuss the reasons that it is believed that 4.4% of the articles are not delivered on time and what steps are being taken to reduce that number.

RESPONSE:

(a) Of the 2,329,666 failures noted in FY 2004, Next Day accounted for 1,742,209 of the failures, while Second Day accounted for 587,457 of the failures.

(b) The reasons why any one particular Express Mail piece does not meet the delivery guarantee can vary; for example, a delay could be caused by inclement weather. The Postal Service continues to work with the airlines to improve transportation.

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DBP/USPS-45. Please refer to your response to DBP/USPS-28.

- (a) How do you reconcile your response in light of DMM Section S915.1.4?
- (b) Please advise why a similar provision does not apply to other accountable mail particularly Express Mail where the label weighs approximately 1/4 of an ounce and could result in an additional \$4.40-\$4.45 in postage for an Express Mail article that went over the 8-ounce weight limit due to the weight of the label.

RESPONSE:

(a) With respect to reconciliation with DMM Section 503.6.1.2, the replacement section for DMM Section S915.1.4, in most cases the weight of the return receipt is excluded from the weight used to determine postage. However, notwithstanding the DMM, if a customer presents a mailpiece with the return receipt already affixed in the appropriate area on the mailpiece, the postage will be paid on the weight of the mailpiece with the return receipt.

(b) Other accountable mail, including Express Mail, is treated the same way as return receipts. If the customer presents the mailpiece with the label(s) already affixed in the appropriate area on the mailpiece, the postage will be paid on the weight of the mailpiece with the labels.