

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-75-86]

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."

May 17, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051Pint

DBP/USPS-75 Please refer to your response to DBP/USPS-47. [a] Please confirm that there are certain fixed costs associated with the provision of Registered Mail service. [b] Please confirm that your response that states, "the costs reported for Registered Mail exclude the costs associated with the Postal Service's use of this product." means that if an IOCS tally found the an employee working on an official USPS Registered Mail article, the costs would be considered as institutional costs and not associated with Registered Mail. [c] Please advise how the fixed costs of Registered Mail are allocated between Registered Mail and Institutional costs. [d] Please confirm that the data contained in response to DBP/USPS-47 subpart c relates only to domestic mail. [e] For the five years shown, also provide the number of International Registered Mail pieces - provide a separate listing for both outgoing and incoming mail. [f] Please advise how the IOCS tallies for Registered Mail distinguish

between domestic and international mail. [g] Please confirm that International Registered Mail is handled in the same manner as domestic Registered Mail. [h] Please advise how the fixed costs of Registered Mail are allocated between domestic and international Registered Mail. [i] Please confirm that if at the time of an IOCS tally an employee is holding 5 pieces of mail, the tally will be made of all 5 pieces even if they are the same category. [j] Please confirm that in general the size and shape of official USPS Registered Mail will be larger and bulkier than the size and shape of non-official Registered Mail. [k] Please confirm that an IOCS tally of an employee working with Registered Mail would be more likely to have a greater number of non-official Registered Mail articles in their hand at the time of a tally than they would have of an official USPS Registered Mail articles based on the size and shape of the two separate categories. [l] Please discuss and explain any items you are unable to confirm.

DBP/USPS-76 Please refer to your response to DBP/USPS-48. Based on the narrative prior to the tables, it would appear that the data was not presented as requested. The request was for various items in each of the 28 categories based on the category that was declared at the time of mailing the article. Please advise and reanswer if necessary.

DBP/USPS-77 Please refer to your response to DBP/USPS-48. In FY-2004 for the 413 claims that were filed but not paid [1012 less 599], were these articles delivered or lost in transit?

DBP/USPS-78 Please refer to your response to DBP/USPS-48. In FY 2004, there were 599 claims paid. Were all of these claims paid in full or were some paid in part?

DBP/USPS-79 Please refer to your response to DBP/USPS-48. Please confirm, or explain if you are unable to confirm, that during FY 2004, one Registered Mail article in approximately 3235 Registered Mail articles resulted in the filing of a claim [4,933,219 minus 1,659,547 for the volume of insured mail divided by 1012 claims filed] and one in approximately 5465 articles resulted in paying a claim. For FY 2003, one letter in approximately 5015 articles resulted in paying a claim. For FY 2002, one letter in approximately 3229 articles resulted in paying a claim.

DBP/USPS-80 Please refer to your response to DBP/USPS-48. [a] Please provide any statistics on the percentage or number of non-insured Registered Mail articles that

are lost in transit. [b] Please provide any statistics on the percentage or number of all non-USPS Registered Mail articles that are lost in transit. [c] Please provide any statistics on the percentage or number of official USPS Registered Mail articles that are lost in transit.

DBP/USPS-81 Please refer to your response to DBP/USPS-48. Having a claim filed for as few as approximately every 3229 articles seems to indicate a poor value of service for a secure service of Registered Mail. [a] Please discuss and explain the significance of these numbers and the level of satisfaction that the Postal Service has with them as they relate, in particular, to providing a secure method of transportation. [b] Please provide any comparable figures for Insured Mail.

DBP/USPS-82 Please refer to R2001-1 Interrogatory DBP/USPS-16 [a] Confirm, or explain if you are unable to do so, that for Express Mail articles other than those addressed to a Post Office Box or General Delivery, an actual physical attempt at the addressee's location must be made prior to the guaranteed time or it will be considered a failure [and thus a refund of postage may be obtained] unless it meets one of the two exemptions in DMM Section E500.5.3/6.2 a and b. [b] Confirm, or explain if you are unable to do so, that Express Mail which is addressed to a Post Office Box or General Delivery will constitute a failure if the addressee does not have access to the post office box and/or the ability to claim the article such as might occur if the box section was closed or the notice of arrival was placed in the box but it was not possible for the addressee to claim the mail. If your answer is the same as provided in R2001-1, please advise why it is appropriate to be able to claim on time delivery when the addressee is unable to physically acquire the article prior to the guaranteed time. [c] Confirm, or explain if you are unable to do so, that contacting an addressee by telephone or by requiring an addressee to pick up their Express Mail at a facility would constitute a failure [other than PO to PO service]. [d] Confirm, or explain if you are unable to do so, that the guaranteed delivery times for both PO to Addressee and PO to PO will be the same areas - both overnight and second day. [e] Clarify DMM Section E500.6.4 - if a PO-PO Express Mail article is sent to a second day area on a Saturday, will delivery be guaranteed on Monday or Tuesday [assume the delivery office is closed on Sunday and open the other six days of the week - is delivery made on the second business day after mailing - Tuesday in this case - or is it delivered on the first business day which is on or after the second day - Monday in this case]?

DBP/USPS-83 In a recent Docket, DMCS Section 182.51g was amended to allow for being able to deny refunds in the event of a "Breakdown of a substantial portion of the USPS transportation network." [a] Please provide a listing of all instances where this provision was either claimed or invoked and the details of the breakdown and the number of claims involved. [b] Please provide a listing of all instances where this provision was initially claimed and then overruled. Please provide the reasons why it was overruled and provide copies of any correspondence or communication.

DBP/USPS-84 With respect to the EXFC/PETE/Express Mail programs, please provide details of the steps that are taken to ensure the accuracy of the data provided by both the droppers and reporters.

DBP/USPS-85 [a] Please explain, in general, the steps taken in processing mail that arrives at an address in which the customer has filed a Change of Address Order. [b] Please indicate the normal time frames for each of the actions to be taken. For example, if a letter arrives at the delivery unit on a Monday, when will that letter be entered into the system with the new address and when will it be placed into the mailstream? [c] Are forwarded letters normally handled with the same delivery standards [1-, 2-, or 3-days] as other letter mail is? [d] If not, please explain. [e] Please advise the action taken with each of the classes of mail [for example, First-Class Mail / Priority Mail / Express Mail / Standard Mail / Package Services / Periodicals / etc.] with a temporary vs. permanent Change of Address Order.

DBP/USPS-86 [a] Please advise the each of the methods that a customer may file a permanent or temporary change of address order. Please provide all methods that are either currently available or have been currently announced as becoming available. [b] Please show the cost to the customer for each method. [c] Please advise the security procedures that are in place for each of the methods to ensure that the request is legitimate.

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 May 17, 2005
