

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-55-60)
(May 20, 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-55. What measures will the USPS put in place to facilitate the purchase of the proposed single piece First-Class stamps so that:

- a. The wait time in postal lines is reduced, and
- b. Sufficient single piece First-Class stamps will be available when the new rates go into effect.

OCA/USPS-56. Upon implementation of the proposed Docket No. R2005-1 rates, what type of “grace” period does the Postal Service offer its customers prior to returning a mail piece for insufficient postage?

OCA/USPS-57. If the proposed Docket No. R2005-1 rate change is implemented on a Sunday, and a customer deposits mail into a USPS mail receptacle on that same Sunday using the former postage rate,

- a. Is the mail piece going to be processed and delivered to its destination? If not, please explain fully.
- b. Is the mail piece going to be returned to the originator? If your response to this interrogatory is affirmative, please provide the USPS’s average cost to return to the originator of the mail piece for insufficient postage: (1) a First-Class letter and (2) a First-Class parcel weighing 13 ounces or less.

OCA/USPS-58. As noted in Docket No. C2001-3, the USPS downgraded several First-Class Mail Zip Code pairs from 2 day delivery to 3 day delivery.

- a. Subsequent to 2001, has the USPS conducted any transportation cost studies to evaluate the savings resulting from those down grades? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.
- b. Subsequent to 2001, has the USPS analyzed the consistency with which deliveries are made to those areas that were down graded? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.

OCA/USPS-59. In previous dockets including Docket No. C2001-3, the USPS indicated that in 2000 and 2001 there was a shift away from air transportation to ground transportation.

- a. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus using ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- b. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting First-Class Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- c. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for

transporting Priority Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

- d. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting Express Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- e. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by air transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- f. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

OCA/USPS-60 For each of the past three years and for each category or type of (a) Express Mail, (b) Priority Mail (c) Package Services and (d) First-Class single piece letters, please provide nationwide data from ODIS (Origin-Destination Information System), EMRS (Electronic Marketing Reporting System), EXFC (External First-Class (Mail system)) and any other applicable data systems showing the volume of mail delivered after the number of days

specified by the applicable service standard. Please provide the frequency – volume, percentage and average – for mail delivered within one to fifteen days after the applicable service standard, broken out for each of the fifteen days. In your response, please include the full calculation for each figure requested, including a description of each figure used in the calculation. Please provide cites to source documents for all figures presented in calculations and provide copies of any documents that have not been previously filed in this docket. (For reference purposes, please refer to Docket No. R2001-1, OCA/USPS-103.)