

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-56-58, 61, 64, 65 and 67]

The United States Postal Service hereby provides its responses to above-listed interrogatories of David Popkin, filed on May 12, 2005. Each interrogatory is stated verbatim and is followed by the response.

Objections to the following interrogatories were filed on April 18, 2005:
DBP/USPS-1, 2, 3, 5, 7, 9, 10, 12, 17-20 and 23.

Response to the remaining interrogatories not objected to are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

DBP/USPS-56

Please refer to your response to DBP/USPS-13 subpart f. Please confirm, or explain if you are unable to do so, that the EXFC program also tests post cards.

RESPONSE: Confirmed.

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

DBP/USPS-57

Please refer to your response to DBP/USPS-13 subpart i. [a] Please elaborate on the meaning of "controlled conditions". [b] Please advise what notice is given to potential mailers under these conditions and if notice is not given, please explain why.

RESPONSE:

[a] "Controlled conditions" are anticipated interruptions in collection service for which the Postal Service is able to plan adequately in advance, as opposed to uncontrolled conditions such as sudden, adverse weather conditions.

[b] Information is usually posted at post offices and is distributed to the local news outlets: newspapers, and radio and television news operations.

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

DBP/USPS-58

Please refer to your response to DBP/USPS-32 subpart a. Please reanswer the subpart if one is to assume that the mailer will obtain a postmark or validation of the mailing receipt in a similar manner that would be required in obtaining a Certificate of Mailing which has to be postmarked to have any validity. Please also add PS Form 3804 Return Receipt for Merchandise to the listing of other forms.

RESPONSE:

Not confirmed. While the postmark on any of these forms, including Form 3804, shows receipt by the Postal Service, only Certificate of Mailing service provides the mailing receipt on PS Form 3817, which may have a special significance to the mailer.

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

DBP/USPS-59.

Please refer to your response to DBP/USPS-33 subpart c. Please confirm, or explain if you are unable to do so, that the mailer must fill in this name and address prior to mailing the article. Please also add PS Form 3804 Return Receipt for Merchandise to the listing of other forms.

RESPONSE:

Not confirmed. However, the DMM does say that Forms 3800, 3804, 3817, and 11-B must be filled out by the mailer.

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

DBP/USPS-61

Please refer to your response to DBP/USPS-38. [a] Please confirm that the CDrom shows Standard Mail delivery standards of 3 to 10 days and that all 50 states are shown. [b] Please confirm that the CDrom shows Package Services delivery standards of 2 to 9 days and that only the 48 contiguous states are shown. [c] Please confirm that the delivery standards in the 48 contiguous states for Package Services is equal to or better than the standard for Standard Mail. [d] Please advise why it is believed that this similar condition [Package Services equal to or better than Standard Mail] would not also apply to locations other than the 48 contiguous states. [e] Please advise what studies have been made to show that 3 to 5 weeks is a realistic estimate of delivery time for Package Services to or from or within areas other than the 48 contiguous states. Please provide copies of the studies. [f] Please confirm that mailers will utilize this 35-day estimate in comparison to the times shown for Express Mail or Priority Mail in making a decision as to which service to utilize. [g] Please confirm that the maximum time shown for Express Mail or Priority Mail is 3 days. [h] Please explain any subparts you are unable to confirm.

RESPONSE:

[a] Confirmed.

[b] Confirmed.

[c] This is generally correct, but without analyzing each of the over 800,000 origin-destination 3-digit ZIP combinations, it is not possible to confirm it unequivocally.

[d] The delivery estimates for Standard Mail and Package Services to offshore locations should be similar, since the mail travels by ship, sometimes two ships, adding significant transit times.

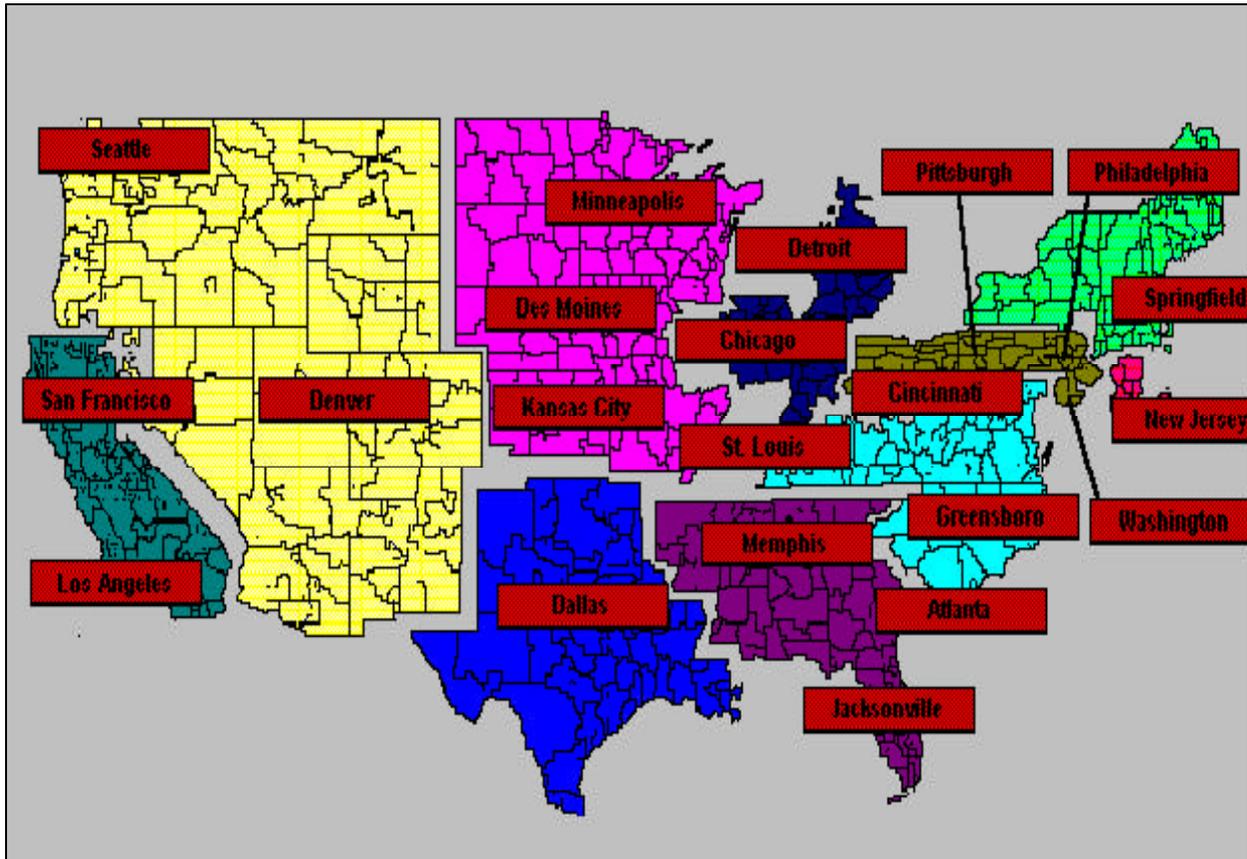
[e] Please see the attached information from Hawaii. The issues are generally the same for other offshore locations.

[f-g] Confirmed.

[h] N/A

Standard Mail Shipping Logistics Continental U.S. and Hawaii May 2001

Direct Mail is usually sent as USPS Standard Mail and often requires specific “in home” delivery dates. Standard Mail moves on many modes of surface transportation (e.g., trains, trucks and ships), and only the most knowledgeable mailer is capable of accurately projecting delivery dates. The attached maps are to help you better understand USPS logistics and the time frames you may expect for transporting Standard Mail across the continent and to Hawaii.



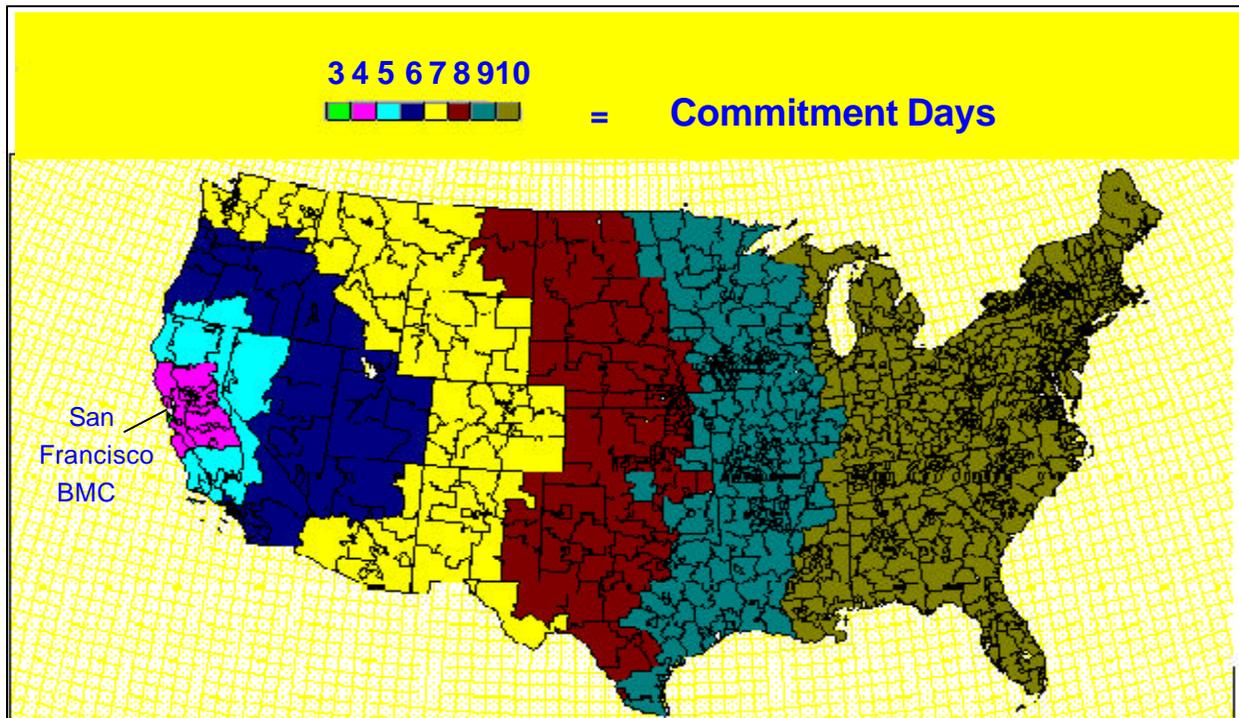
Bulk Mail Center Locations

Standard Mail (formerly known as Third and Fourth Class Mail) is sorted and dispatched through these dedicated facilities.

San Francisco Bulk Mail Center and Mail Destined to Hawaii

San Francisco is a critical destination for mail entered on the continent and addressed to Hawaii because most mail destined for the islands' travels through the San Francisco Bulk Mail Center. The map below indicates the number of days required to move Standard Mail from all points in the continental US to San Francisco. On average, Standard Mail may take from one to ten days to arrive in San Francisco depending on the site of origin.

***Standard Mail Commitment Days from
continental locations to San Francisco***

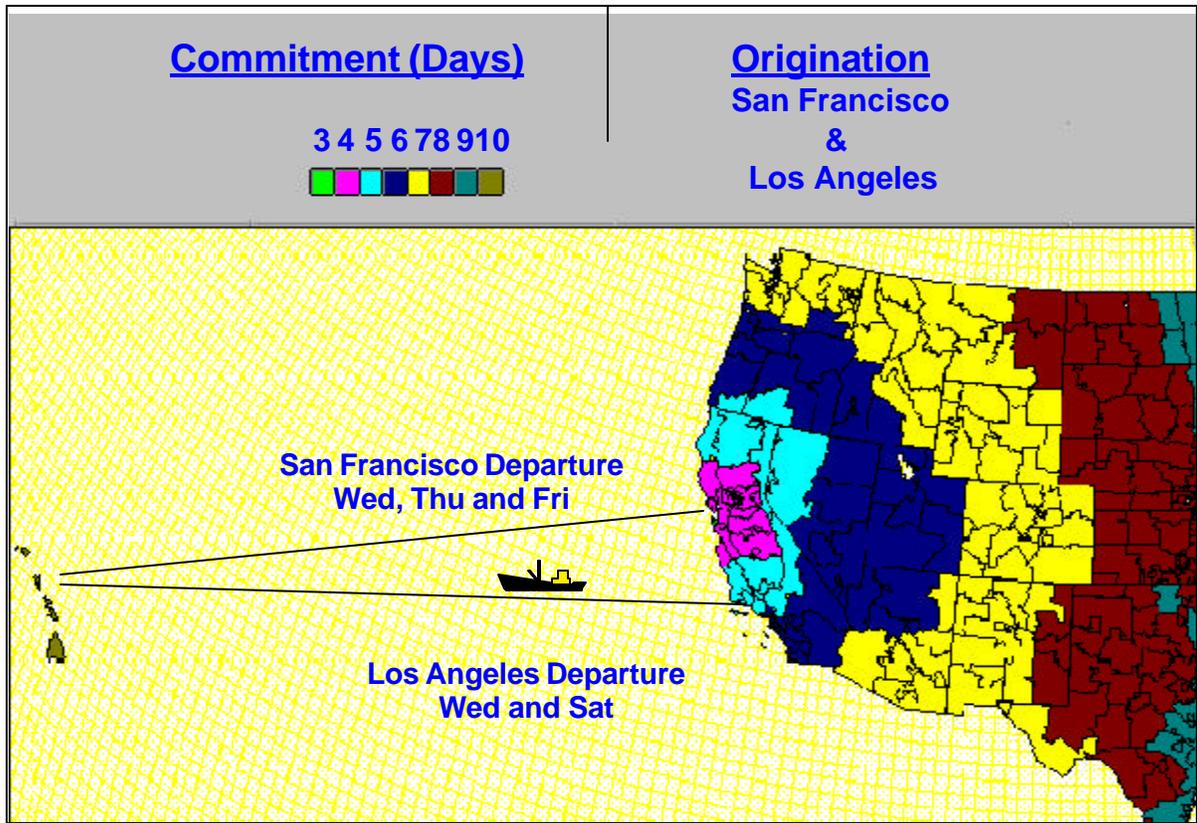


Colors on the map represent the number of days between entry and delivery. For example, the average number of delivery days between the eastern portion of the country and San Francisco is ten.

Shipping Schedule from the West Coast to Hawaii

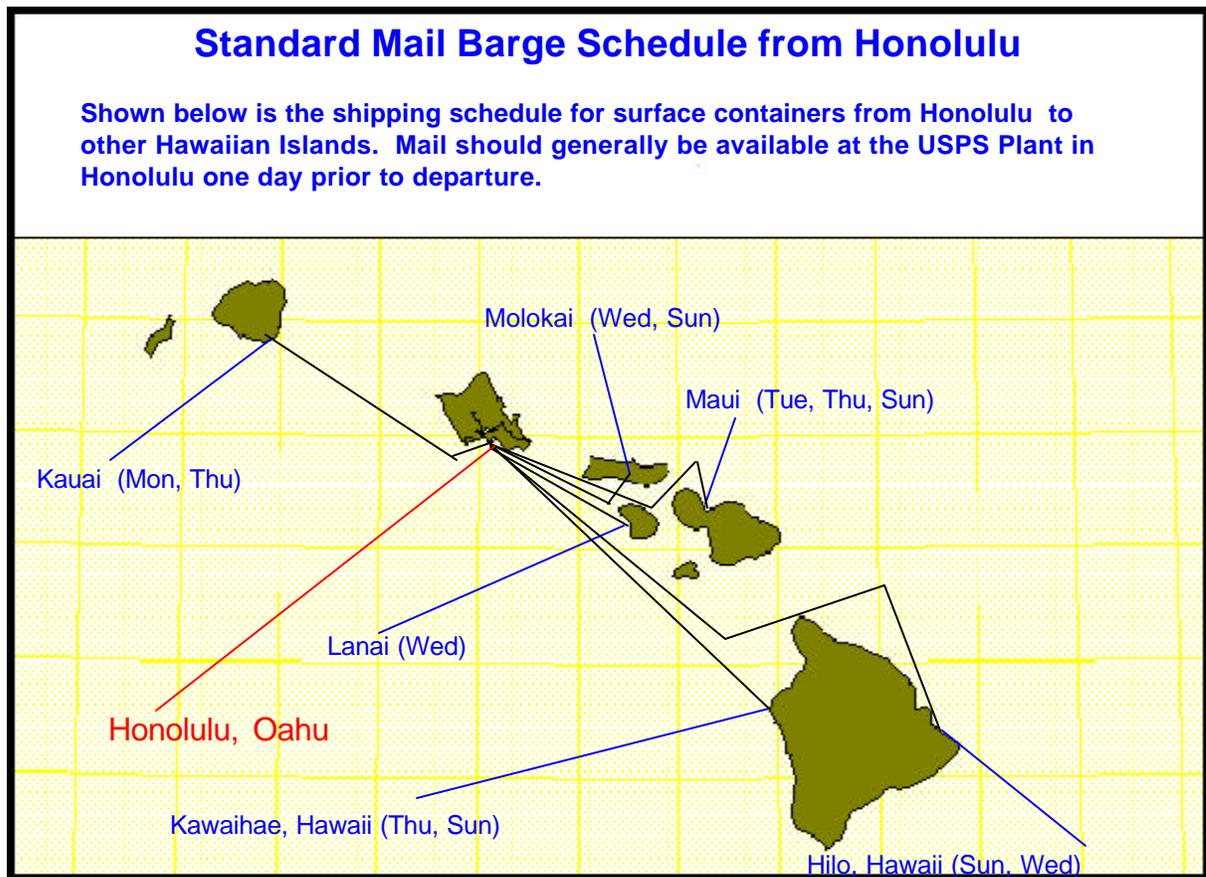
The Los Angeles Bulk Mail Center (BMC) ships mail originating in Southern California, and the San Francisco BMC ships mail from other entry locations nationwide. The map below shows shipping routes and days of dispatch from these facilities. To make connections out of either location, mail should be available at the local BMC at least one day prior to the ship's departure. Transit time from both locations is approximately 4 - 5 days.

Standard Mail Shipping Schedule From the West Coast



Transporting Standard Mail to Islands Outside of Oahu

Standard Mail is shipped by barge from Honolulu to islands outside Oahu. As with other modes of transportation, the USPS contracts with barge operators to move the mail and Standard Mail is generally delivered within two to three days after receipt at the outside islands port. To make connections on a barge, mail should be at the Honolulu Post Office at least one day prior to the ship's departure. At dispatch time, full (and half full) 1200 cubic foot containers will be sent to the docks for shipping.



Targeting Delivery Dates

Given the ten days it takes to cross the continent, and the five days to cross the Pacific Ocean, Standard Mail entered on the east coast will be delivered in Honolulu in an average of twenty-one days. Delivery time is generally longer during the heavier Fall mailing season. However, there are several ways to reduce delivery time throughout the year. For example, when mailing to Hawaii, entering mail on the west coast is ten days faster than entering on the east coast. Drop Shipping into Honolulu via Express Mail or Priority Mail (from any point in the country) is at least five days faster than entering Standard Mail on the west coast.

This report prepared by Gary Gardetto, Honolulu USPS Manager, Marketing

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

DBP/USPS-64

[a] Please provide the average cost of processing a Registered Mail claim. [b] Does the cost depend on the value of the claim? [c] If so, please provide the average cost for each value bracket.

RESPONSE:

[a-c] The Postal Service does not have data on the average cost of processing a Registered Mail claim, or whether the processing cost depends on the value of the claim.

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

DBP/USPS-65. Please refer to your response to DFC/USPS-22 subpart a. Please advise how the mailer will know of this capability.

RESPONSE:

A customer might know by prior experience with obtaining Certified Mail receipts, or by knowledge of DMM § 503.3.3.5d, which explains how to obtain a postmarked sender's receipt.

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

DBP/USPS-67

Please refer to your response to DFC/USPS-27. [a] Please confirm, or explain if you are unable to do so, that the following criteria exist for evaluating the time for an EXFC test letter: [1] If the scheduled service standard time for the letter is a delivery date and the letter is delivered on that day, the EXFC tally will be that day. [2] If the scheduled service standard time for the letter is a non-delivery date and the letter is delivered on next available delivery date, the EXFC tally will be the time of the scheduled delivery standard. [3] The only way that an EXFC letter could show a tally which was less than the scheduled delivery standard, such as a letter sent to a 3-day delivery area being tallied as 1 or 2 days, would be for the letter to be physically delivered in that time. [4] If the letter is not delivered by the scheduled service standard time and the day before the actual delivery day is a delivery date, the EXFC tally will be the time of the actual delivery. [5] If the letter is not delivered by the scheduled service standard time and the day[s] before the actual delivery day is[are] a non-delivery date, the EXFC tally will be the number of days to the first non-delivery day so long as it will not show delivery in less time than the scheduled delivery standard. [6] There are no arrangements of non-delivery days that would allow for the EXFC tally to show a time which was less than the scheduled delivery standard, namely, a letter sent to a 3-day area would not be tallied as being delivered in 1 or 2 days or a letter sent to a 3-day area would not be tallied as being delivered in 1 day unless it actually got delivered in that reduced time. [b] Are there any instances where a letter that is expected to be inducted into the system on, for example, a Wednesday, is physically deposited in the collection box on Tuesday? [c] If so, please explain. [d] Do the various criteria enumerated in subpart a apply to all other systems that are utilized by the Postal Service to measure the time of delivery of mail? [e] If not, please explain and provide details.

RESPONSE:

[a1-2] Yes.

[a3] Not necessarily, see example #4.

[a4] – Yes.

[a5] – See examples for calculation of delivery day. The service standard is not factored in to delivery day calculation

[A6] – No, see example #4.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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RESPONSE to DBP/USPS-67 (continued):

- [b] No
- [c] N/A
- [d] The criteria apply for EXFC, PETE and ODIS.
- [e] N/A