

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
Submitted 5/31/2005 5:45 am
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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-96-107]

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 31, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051Uint

DBP/USPS-96 Please refer to your response to DBP/USPS-68. [a] Do the total volume figures utilized include those articles that are mailed with other than the single receipt forms referenced in the six subparts of DBP/USPS-68 such as might occur with a firm mailing book or manifest or other multiple entry? [b] If so, please recalculate or estimate the percentages of the single receipt forms that are postmarked or otherwise validated by the Postal Service at a retail window or any other place of mailing. [c] Please provide a breakdown of the method of presentation to the Postal Service of the total volume of Delivery Confirmation articles.

DBP/USPS-97 Please refer to your response to DBP/USPS-51. Please confirm, or explain if you are unable to do so, that Postal Service insurance may only be obtained for loss or damage to merchandise and may not be obtained for loss or damage to contents that are required to be sent as First-Class Mail or Express Mail.

DBP/USPS-98 Please refer to your response to DBP/USPS-51. Please provide an estimate of the percentage of the number of Registered Mail articles that are sent by Registered Mail where the primary reason for doing so is the level of security that is provided by Registered Mail.

DBP/USPS-99 Please refer to your response to DBP/USPS-58. Please confirm, or explain if you are unable to do so, that if a mailer obtains a postmark or other validation on one of the referenced forms other than the Form 3817, it will provide evidence that the Postal Service has received the mailpiece from the mailer in a manner similar to that which is obtained by a postmarked or validated Form 3817.

DBP/USPS-100 Please refer to your response to DBP/USPS-59. I am confused by your inability to confirm DBP/USPS-59 and then state that the DMM states that the name and address must be included on the receipt form. Please explain.

DBP/USPS-101 Please refer to your response to DBP/USPS-61. Based on the attachments that explain the delivery time to and from Hawaii and your response to subpart e where you state that it is generally the same for other offshore locations, it would appear that the Service Standards CDrom information for Hawaii and other offshore locations of 10 days or less for Standard Mail is incorrect and the CDrom should not show data for Standard Mail as it does not shown data for Package Services. [a] Please explain and discuss. [b] Does Alaska meet the same criteria as an "other offshore location" as specified in your response to DBP/USPS-61 subpart e? [c] If not, please explain the processing of mail to and from Alaska in a similar manner to the data provide for Hawaii.

DBP/USPS-102 Please refer to your response to DBP/USPS-67 subpart a. [a] Please confirm, or explain if you are not able to do so, that if I mail a letter on Saturday that is delivered on the following Monday it will be tallied as being delivered in one day, regardless of the service standards for that letter. [b] Please confirm, or explain if you are not able to do so,

that if I mail a letter on Saturday before a three-day weekend due to a Monday holiday that is delivered on the following Tuesday it will be tallied as being delivered in one day, regardless of the service standards for that letter. [c] Please advise the percentage of mail destined to a location that has a 2-day delivery standard that is delivered on the next calendar day. [d] Please advise the percentage of mail destined to a location that has a 3-day delivery standard that is delivered on the next calendar day and the percentage delivered on the second calendar day. [e] For a recent EXFC report, please advise the days-to-delivery for both 2-day and 3-day delivery standards. [f] For the same EXFC report as used in subpart e, calculate the days-to-delivery for both 2-day and 3-day delivery standards if the criteria for days-to-delivery were changed to take into consideration the delivery standard [namely, if the letter is delivered on the first delivery day following one or two non-delivery days, utilize the delivery standard as the days to delivery if the delivery standard would have been one of the non-delivery day[s] prior to the day of delivery].

DBP/USPS-103 Please refer to your response to DBP/USPS-49 subparts e and f. [a] Please provide a listing of the "many factors" and "local area considerations" that are taken into account in determining whether to provide Sunday/holiday delivery or not. [b] Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing or not providing service on Sunday/holiday. [c] Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing or not providing regular overnight service [d] Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing service by 12 noon vs. 3 PM at an office.

DBP/USPS-104 Please refer to your response to DFC/USPS-13. You state that the FedEx network is not in operation on some federal holidays. [a] Please advise the holidays in the past year that it was in operation. [b] Was "normal weekday" overnight Express Mail provided on those holidays? [c] If not, why not?

DBP/USPS-105 Please refer to your response to DFC/USPS-11. Please provide a separate listing for the percent of Priority Mail delivered for each of the first five days broken out by the service standards for overnight, 2-day, and 3- day mail.

DBP/USPS-106

Please advise what each of the C/S 1 through C/S 20 represent for Registered Mail Cost by Segment and Component in USPS-LR-K-5.

DBP/USPS-107

Please refer to the USPS website for Express Mail Service Commitments¹. [a] Please confirm that under the Service Commitment column, there are four possible entries: Next day by 12 P.M., Next day by 3 PM, 2 Days, and 2 Delivery Days. [b] Please define each of these terms. [c] Please confirm that the website states on all scenarios in a yellow box, "Next day by 10 A.M. - Post Office to Post Office only". [d] Please confirm that Post Office to Post Office service is not available in all scenarios. [e] Please explain why this wording is shown on scenarios where the service is not available? [f] Please confirm that the pull-down menu for 2 Delivery Days states, "Guaranteed second-day delivery by noon or 3:00 p.m. For Post Office™ to Addressee mailing, excluding Sundays and holidays. Mailers must use a Post Office to Addressee label for these mailings. For Post Office to Post Office mailings, we offer a second-delivery day by 10:00 a.m. service commitment. Mailers must use a Post Office to Post Office label for these mailings." [g] If I send an Express Mail article from Englewood NJ 07631 to Bronx NY 10470 on a Saturday it states it will be delivered in 2 Delivery Days. If I follow the definition for 2 Delivery Days literally, it would appear that the article will be delivered on Tuesday rather than Monday since Sunday does not count and Monday would be the first non-Sunday/holiday delivery day and Tuesday would be the second non-Sunday delivery day. Shouldn't 2 Delivery Days be shown as Next Delivery Day in some instances where it is lack of Sunday/holiday delivery at the destination post office rather than the lack of transportation results in the later delivery? [h] Shouldn't there be some distinction shown to indicate the delivery day based on both weekend available transportation as well as delivery/non-delivery on Sunday/holiday? [i] Please advise the source of the times and Collection Box locations shown in the places where one may deposit an Express Mail article. [j] Please confirm that Express Mail may be deposited in any blue collection box, Express Mail or non-Express Mail. [k] Does the deposit of Express Mail prior to a collection time shown on the collection box determine the service standards or is it the time that the article is processed at the outgoing post office that determines the service standards? [l] Please discuss how the collection time on an Express Mail collection box should be established with respect to the Express Mail cut-off time at the post office. [m] If I deposit an Express Mail article in an APC prior to the cut-off time and it is not logged in until after the cut-off time, does it receive the

¹ http://webapps.usps.com/expressmailcommitments/commitments_results_w.jsp?search

guarantee that existed prior to the cut-off time? [n] Please explain those items you are unable to confirm.

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 31, 2005
