

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-69-71)  
(May 31, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-69-71, submitted on May 16, 2005. The Postal Service objected to interrogatory DBP/USPS-72 on May 26, 2005.

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-69.** Please refer to your response to DFC/USPS-6 subpart b. The average time of delivery for Next Day Service is shown as less than one day.

- (a) Please confirm, or explain if you are unable to do so, that the average time of delivery is calculated by adding up the total number of days that letters took to deliver and then dividing that by the total number of pieces.
- (b) In the calculation, did the Postal Service utilize calendar days or delivery days and explain the reason for the choice?
- (c) Please confirm, or explain if unable to do so, that the Postal Service uses the date of first attempted delivery rather than the date of actual delivery.
- (d) This would appear to indicate that there are a number of letters that were delivered in zero days (on the day of mailing). Please confirm or explain and also please advise the conditions under which same day delivery would take place and the types of letters that might be delivered on the same day.
- (e) Does the number of delivery days shown in the calculation utilize the 24-hour period from midnight to midnight or does it utilize the 24-hour period based on the guaranteed time of delivery. For example, a letter mailed on Monday to an overnight location with a 12 Noon guarantee and delivered at 2 PM Tuesday, does it count a one day since it was delivered on Tuesday or two days since it was delivered after the guarantee time on Tuesday? Please explain the reason for the choice.
- (f) How does the inability to deliver Express Mail on certain days of the week (such as Sunday and holiday) affect the response?
- (g) Please provide a breakdown from zero calendar days to four calendar days and then for five or more calendar days and show the percentage of letters delivered in each of the fifteen categories in the response to DFC/USPS-6 subpart b.
- (h) Are there any reasons known for the 74% increase in the time for Custom Design mail between 2003 and 2004.

**RESPONSE:**

(a) Not confirmed. The average time to deliver is the weighted average of hours to deliver divided by 24 (the number of hours in one day). The hours to deliver are the amount of time (in ten-thousandths of hours) from the time of acceptance to the time of attempted delivery or delivery.

(b) As noted in the response to subpart (a), hours to deliver were used to calculate the average days to deliver.

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(c) Confirmed.

(d) Please see the response to subpart (d), which states how the 24-hour period is calculated. Express Mail is often delivered at an earlier time of the day than when it was accepted. Thus, an Express Mail piece can be accepted before the cutoff time and early enough to be delivered within the same 24-hour period.

(e) The 24-hour period begins at the time of acceptance of the mailpiece.

(f) It does not affect the response.

(g) The following table reflects the number of days to deliver based on actual clock time as reflected in the Program Tracking System. Zero indicates 0 to 24 hours, 1 indicates 24 to 48 hours, etc.

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		Days to Delivery			Volume Share				
	Days	FY2002	FY2003	FY2004	FY2002	FY2003	FY2004		
PO to PO	Next Day	0	0.78	0.78	0.79	84%	84%	85%	
		1	1.19	1.18	1.17	15%	15%	14%	
		2	2.37	2.41	2.40	1%	1%	1%	
		3	3.60	3.55	3.58	0%	0%	0%	
		4	4.58	4.57	4.54	0%	0%	0%	
		>4	10.67	10.70	10.19	0%	0%	0%	
	2 Day	0	0.74	0.74	0.73	40%	39%	40%	
		1	1.55	1.58	1.60	52%	53%	54%	
		2	2.37	2.41	2.41	6%	6%	5%	
		3	3.48	3.49	3.53	1%	1%	1%	
		4	4.61	4.61	4.60	0%	0%	0%	
		>4	8.13	8.16	8.09	0%	0%	0%	
	PO to Addressee	Next Day	0	0.83	0.83	0.83	73%	74%	75%
			1	1.16	1.16	1.15	25%	25%	24%
2			2.28	2.34	2.33	1%	1%	1%	
3			3.43	3.37	3.42	0%	0%	0%	
4			4.36	4.41	4.40	0%	0%	0%	
>4			10.83	10.55	9.65	0%	0%	0%	
2 Day		0	0.79	0.79	0.78	35%	33%	34%	
		1	1.61	1.63	1.64	49%	49%	52%	
		2	2.20	2.22	2.22	14%	15%	13%	
		3	3.35	3.36	3.49	1%	2%	1%	
		4	4.43	4.43	4.45	0%	0%	0%	
		>4	8.40	8.18	7.90	0%	0%	0%	
Custom Designed		0	0.70	0.71	0.71	66%	63%	56%	
		1	1.30	1.32	1.36	22%	24%	22%	
	2	2.55	2.58	2.62	6%	6%	9%		
	3	3.59	3.61	3.61	3%	4%	6%		
	4	4.57	4.58	4.58	1%	2%	3%		
	>4	13.74	10.43	9.10	2%	2%	3%		

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(h) The Custom Design data in the table in DFC-USPS-6(b) was erroneous for FY 2003 and FY 2004. The correct average days to deliver for Express Mail Custom Design should have been 1.33 and 1.58, respectively, as opposed to 1.34 and 2.33 as previously reported. Appropriate errata will be filed shortly.

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**DBP/USPS-70.** Please advise any policy decisions that exist as to whether Express Mail should be delivered as early as possible or whether delivery may be made at any time prior to the guaranteed delivery time. For example, if an Express Mail article for me arrives at the Englewood Post Office on Wednesday afternoon with a guaranteed delivery time of Noon on Thursday, should it be delivered on Wednesday or Thursday or if it arrives early Wednesday morning with a guaranteed delivery time of Noon on Wednesday, should the carrier deviate from his route to deliver the mail as soon as possible rather than anytime prior to Noon?

**RESPONSE:**

The policy of the Postal Service with respect to Express Mail commitments is to deliver the Express Mail piece within the guaranteed time and as early as practicable.

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**DBP/USPS-71.**

- (a) Please provide a listing of those post offices that Post Office-to-Post Office Express Mail may be accepted and the conditions for acceptance.
- (b) Does the list depend on where the letter originates (for example, it may be accepted for pickup at the Englewood NJ Post Office if it is sent from any place in the NY Metro Area but not if it is sent from other places in the country)?
- (c) Must the article be claimed at a service window during the hours that it is open?
- (d) If not, please explain.
- (e) Please advise how non-window hours on Saturdays affects the service guarantee.
- (f) Please advise how a mailer will know whether the post office that the article is being sent to has Saturday window hours?
- (g) Please advise how the mailer will know that the window hours at the post office of address will be after the 10 AM guarantee time for the service.
- (h) What percentage of the post offices in the country has window service on Saturday? Please also provide the data for each of the areas.

**RESPONSE:**

- (a) All post offices, stations and branches can accept Post Office-to-Post Office Express Mail. The condition for acceptance of Next Day Post Office-to-Post Office Express Mail is that the mailpiece is available for pickup at the destination post office by 10:00 a.m. the next day the office is open for business. The condition for acceptance of Second Day Express Mail is that the mailpiece is available for pickup at the destination post office by 10:00 a.m. the second day the office is open for business. Post offices have a directory which outlines those areas eligible to receive Express Mail Next Day Service. Second Day Service is available at all areas not listed as eligible for Next Day Service in the Next Day Service directory
- (b) No. All retail offices offer acceptance of Express Mail Post Office-to-Post Office mailpieces.

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(c) Yes.

(d) N/A.

(e) The service guarantee is determined, in part, by the hours of operation of the retail unit. If the office were closed and had non-window operation, this would prevent a delivery guarantee from being made for that particular day.

(f)-(g) The mailer could call the destination post office to find out the hours of operation, or call 1-800-ASK-USPS, or check on the Postal Service website, [www.usps.com](http://www.usps.com), for the hours of operation for any post office.

(h) The Postal Service is unable to provide any reliable information at this time. The database that maintains this information is currently being overhauled.