

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-87, 89)
(May 31, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-87, 89, submitted on May 17, 2005. A response to DBP/USPS-88 is forthcoming.

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-87.** Please refer to your response to DBP/USPS-49 subpart h.
- (a) Please refer to the first sentence of your response and confirm that attempted delivery would be made on the fourth calendar day after mailing if both the second calendar day after entry and the third calendar day after mailing were a Sunday or holiday and Sunday/holiday street delivery is not available to the destination address, or in the case of an article sent to a post office box, the second and third calendar day after entry are days when the destination post office is closed (This would be where the letter was mailed on a Friday to a 2-day area and there was a Monday holiday).
 - (b) Please confirm that the first sentence of the response would also refer to mail sent to General Delivery as it relates to post office box delivery.
 - (c) Please confirm that your response failed to provide the third calendar after mailing scenarios to the following cases: (1) The article is mailed on a Saturday to an overnight area that does not have Sunday/holiday delivery and there is a Monday holiday. (2) The article is mailed after the Friday cut-off time to an overnight area that does not have Sunday/holiday delivery and there is a Monday holiday. (3) The article is mailed after the cut-off time on the day prior to a holiday (this could result in various scenarios depending upon the dates and relationship to Sunday).
 - (d) Please confirm that if the original subpart h interrogatory would have had the words "or later" at the end of the first sentence, the response to DBP/USPS-49 subpart h and DBP/USPS-87 taken together would be a complete response to the corrected wording.
 - (e) Please fully explain any subparts you are unable to confirm.

RESPONSE:

- (a) Confirmed.

- (b) Confirmed.

- (c) That response provided general information as to when Express Mail may be scheduled for delivery on the third calendar day after mailing. With respect to your three scenarios:
 - 1. Scheduled for delivery on the third calendar day.
 - 2. Scheduled for delivery on the fourth calendar delivery.
 - 3. It would depend upon the day of the week the holiday would occur. For example, deliveries are made on the days before and after Tuesday,

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Wednesday, and Thursday holidays. The item could conceivably be delivered before the third calendar day.

(d) Not confirmed, because the Postal Service's responses to DBP/USPS-49(h) and DBP/USPS-87 do not, taken together, provide "a complete listing of all possible scenarios" based on specific days of the week or specific offices. As such, it cannot be said that they provide a "complete response" to that interrogatory.

(e) Explanations provided in relevant subparts.

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DBP/USPS-89. Please confirm, or explain if you are unable to confirm, that with the exceptions provided in response to DBP/USPS-88, an Express Mail article mailed prior to the cut-off time at all offices provided in response to DBP/USPS-21 on a Monday in a week that does not have a Tuesday or Wednesday holiday will receive the attempted delivery made on either Tuesday or Wednesday at all ZIP Codes and types of addresses provided in response to DBP/USPS-22.

RESPONSE:

Confirmed.