

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-102-118)  
(June 1, 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-102. Please refer to the response to DBP/USPS-48, regarding Registered Mail, where it states, in part, “The number of claims, the number of claims paid, and the dollar amount paid for claims do not exactly match the numbers provided in response to DFC/USPS-23 because the response to this interrogatory [DBP/USPS-48] is based on data relating to claims accepted in a fiscal year while the earlier response [to DFC/USPS-23] used data that tracked claims resolved in a fiscal year.” Also, please refer to Pages 2 and 3 of the Attachment to DBP/USPS-48. For FY 2000 through FY 2003, please provide number of “Claims Paid” by value category, and the amount of “claims resolved in a fiscal year” by value category.

OCA/USPS-103. Please refer to the response to OCA/USPS-10(a), which states, in part, “The Sunday/holiday exclusion does not apply to certain Express Mail pieces.” Please confirm that the Sunday/holiday exclusion does not apply to Next Day Express Mail delivered to 13,928 ZIP Codes nationwide. If you do not confirm, please explain.

OCA/USPS-104. Please refer to the response to OCA/USPS-11(b)-(c), which states, “Confirmed that the ODIS Quarterly Statistics Reports do not address levels of achieved performance for overnight and second day Express Mail. See the response to DFC/USPS-5.” Please confirm that the reference to “DFC/USPS-5” should be “DFC/USPS-6”. If you do not confirm, please explain.

OCA/USPS-105. Please refer to the response to OCA/USPS-18, and USPS-LR-K-82.

- a. Refer to the response to OCA/USPS-18(a), which references DFC/USPS-5 and 7. Other than PETE or ODIS, please identify any other data or measurement system that provides the average number of days to delivery for the mail classes and groups listed in Table 4 of USPS-LR-K-82, and

- provide the average number of days to delivery for the mail classes and groups listed from such data or measurement systems. If PETE and ODIS are the only data or measurement systems providing this information for the mail classes and groups listed in Table 4 of USPS-LR-K-82, please identify PETE and ODIS as such.
- b. Refer to the response to OCA/USPS-18(b), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of mail delivered for Day 1 through Day 10 for each of the mail classes and groups listed in Table 4 of USPS-LR-K-82, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.
  - c. Refer to the response to OCA/USPS-18(c). Please identify any data or measurement system other than ODIS that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.
  - d. Refer to the response to OCA/USPS-18(d), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for each of the mail classes and groups listed in Table 5 of USPS-LR-K-82, and provide the required percentages and average number of days from such data or

measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

- e. Refer to the response to OCA/USPS-18(e). Please identify any data or measurement systems other than ODIS that permit comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, and provide the required percentages and average number of days from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

OCA/USPS-106. Please refer to the response to OCA/USPS-18(c).

- a. From a consumer perspective, please confirm that Priority Mail and First-Class Mail have the same service standard, i.e., overnight delivery, 2<sup>nd</sup> day delivery, or 3<sup>rd</sup> day delivery. If you do not confirm, please explain.
- b. Please confirm that the service standard for Priority Mail and First-Class Mail is the same irrespective of the shape of the mailpiece entered by the postal customer; that is, for the same 3-digit origin-destination ZIP Code pair, a letter-shaped mailpiece and a flat-shaped mailpiece would have the same service standard. If you do not confirm, please explain.
- c. Please confirm that the 3-digit origin-destination ZIP Code pairs used for overnight Priority Mail are the same for overnight First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for overnight First-Class Mail that coincide with overnight Priority Mail.

- d. Please confirm that the 3-digit origin-destination ZIP Code pairs used for 2<sup>nd</sup> day Priority Mail are the same for 2<sup>nd</sup> day First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for 2<sup>nd</sup> day First-Class Mail that coincide with 2<sup>nd</sup> Priority Mail.
- e. Please confirm that the 3-digit origin-destination ZIP Code pairs used for 3<sup>rd</sup> day Priority Mail are the same for 3<sup>rd</sup> day First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for 3<sup>rd</sup> day First-Class Mail that coincide with 3<sup>rd</sup> day Priority Mail.

OCA/USPS-107. Please refer to the response to DFC/USPS-5(b), and OCA/USPS-14(a), which states, in part, "Priority Mail has a service standard that can be overnight, 2<sup>nd</sup> day, or 3<sup>rd</sup> day." Please explain why the Postal Service does not measure the percentage of Priority Mail achieving the 3<sup>rd</sup> day service standard using PETE.

OCA/USPS-108. Please refer to the response to DFC/USPS-4. Please provide a table showing EXFC on-time service performance by quarter for FY 2002, FY 2003 and FY 2004.

OCA/USPS-109. Please refer to the response to OCA/USPS-27.

- a. Refer to the response to OCA/USPS-27(a), where it states, in part, "information on failures can help local staff diagnose and remediate systematic problems." Please define the term "failures" as used in this context, discuss what is being referred to in the phrase "information on failures," cite the table(s), and refer to the specific data on "failures" in the

- table(s) cited, that “help local staff diagnose and remediate systematic problems,” and explain how local staff use the data cited.
- b. Refer to the response to OCA/USPS-27(b). Please identify any data or measurement system other than ODIS that provides data on the achieved levels of performance with respect to the 2<sup>nd</sup> Day, 3<sup>rd</sup> Day, 4<sup>th</sup> Day, 5<sup>th</sup> Day, 6<sup>th</sup> Day, 7<sup>th</sup> Day, 8<sup>th</sup> Day, and 9<sup>th</sup> Day separately for the Parcel Post, BPM, Media Mail, and Library service standards referred to in response to interrogatory OCA/USPS-26. If ODIS is the only data or measurement system, please identify ODIS as such.

OCA/USPS-110. Please refer to the response to OCA/USPS-32(a) - (b).

- a. Refer to the first bullet. Please confirm that the special services for which claims may be made by postal customers are: Registered Mail (with insurance) service, Insurance service, and COD service. If you do not confirm, please explain and identify all special services for which claims may be made by postal customers.
- b. Refer to the first bullet. Fiscal Years 2002, 2003 and 2004, with respect to each of the special services identified in subpart a. of this interrogatory, please provide the number of claims and percentage of claims paid with respect to properly completed and supported claims prior to day 10, within 10 to 15 days, and subsequent to 15 days, after receipt of claims from post offices where filed.
- c. Refer to the second bullet. For Fiscal Years 2002, 2003 and 2004, please provide nationwide data for First-Class Mail parcels and Package Services

parcels showing the percent of time that such parcels are delivered within the number of days specified by the applicable service standard, and the average number of days to delivery.

- d. Refer to the third bullet. Fiscal Years 2002, 2003 and 2004, with the exception of the period between November 16 and January 1, please provide the number and percentage of mailing lists corrected within 15 working days with respect to the special services Address Changes for Election Boards, Correction of Mailing Lists, and ZIP Coding of Mailing Lists.

OCA/USPS-111. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 26, where it refers to the Phoenix-Hecht Postal Survey.

- a. Does the Postal Service consider the Phoenix-Hecht Postal Survey an objective, statistically validated measurement system for end-to-end (entry to exit at remittance processor's receiving destination) service performance for First-Class remittance mail? Please explain.
- b. To what extent does the Postal Service use the Phoenix-Hecht Postal Survey to measure the end-to-end service performance for First-Class remittance mail? Please explain.

OCA/USPS-112. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, and Exhibit 2-2., "First-Class Mail Service Standard Improvement," at page 27.

- a. Please refer to the row "PQ 2 -00," column "3-Day Service." Please confirm that the entry 683,218 should equal 683,153 (849,043 - 8,744 - 157,081). If

- you do not confirm, please explain. If you do confirm, please explain the cause of the discrepancy between Exhibit 2-2 and your answer.
- b. Refer to the row “Change +/-,” column “Total Pairs.” Please show the distribution of the 1,844 3-digit ZIP Code pairs to the 1-day service, 2-day service, and 3-day service columns.
  - c. For the period PQ 2 2000 to PQ 2 2003, please provide the number of 3-digit ZIP Code pairs that:
    - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
    - ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
    - iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.
  - d. For the period PQ 2 2000 to PQ 2 2003, please provide the percentage of First-Class Mail volume associated with the 3-digit ZIP Code pairs that:
    - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
    - ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
    - iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

OCA/USPS-113. Please refer to the Postal Service’s Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 87, where it states, in part, “The Express Mail

Validation System (EMVS) is an external validation of Express Mail service performance. EMVS provides a side-by-side service standard comparison of Express Mail test pieces with PTS [Product Tracking System].” Please provide the same level of detail with respect to EMVS as is provided for EXFC and PETE for the following: “Indicator,” “Scope,” “Statistical Reliability,” “Limitations,” “Source” and “Data Verification and Validity.”

OCA/USPS-114. Please refer to the response to USPS-LR-K-117, “First-Class Mail Service Standard Changes.”

- a. For PQ 4 of 2002, please confirm that the Postal Service upgraded 40 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service. If you do not confirm, please explain.
- b. For PQ 4 of 2002, please provide the percentage of First-Class Mail volume associated with the 40 3-digit ZIP Code pairs that were upgraded.
- c. During FY 2002, did the Postal Service upgrade or downgrade any other First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these upgraded and downgraded 3-digit ZIP Code pairs.
- d. For PQ 1 of 2003, please confirm that the Postal Service upgraded 106 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service, and downgraded 90 ZIP Code pairs from 2-day service standard to 3-day service standard. If you do not confirm, please explain.

- e. For PQ 1 of 2003, please provide the percentage of First-Class Mail volume associated with the 106 3-digit ZIP Code pairs that were upgraded, and the 90 3-digit ZIP Code pairs that were downgraded.
- f. During FY 2004, did the Postal Service upgrade or downgrade any First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these 3-digit ZIP Code pairs.
- g. For PQ 2 of 2005, please confirm that the Postal Service upgraded 20 First-Class Mail 3-digit ZIP Code pairs from 2-day service standard to 1-day service, and downgraded 9 ZIP Code pairs from 1-day service standard to 2-day service standard. If you do not confirm, please explain.
- h. For PQ 2 of 2005, please provide the percentage of First-Class Mail volume associated with the 20 3-digit ZIP Code pairs that were upgraded, and the 9 3-digit ZIP Code pairs that were downgraded.

OCA/USPS-115. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

- a. Please identify the mail "categories of Standard Mail pieces" for which CONFIRM service is used to track service performance.

- b. Please identify the “indicators useful for the Postal Service,” and explain how those indicators are useful.
- c. Please confirm that the data generated by CONFIRM service is “statistically representative” for the mail “categories of Standard Mail pieces” identified in subpart a., above? If you do confirm, please provide the statistically representative results for the mail categories of Standard Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:
  - i. Has the Postal Service undertaken any analysis of the data generated by CONFIRM service to determine the requirements or changes necessary to make the data “statistically representative” for the mail “categories of Standard Mail pieces” identified in subpart a., above? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the CONFIRM service data “statistically representative.”
  - ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by CONFIRM service “statistically representative” for the mail “categories of Standard Mail pieces” identified in subpart a., above? Please explain.

OCA/USPS-116. Please refer to the Postal Service’s Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery

Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

- a. Please confirm that the data generated by Delivery Confirmation and/or Signature Confirmation service is “statistically representative” for Parcel Select? If you do confirm, please provide the statistically representative results for Parcel Select. If you do not confirm, please provide the results currently available to track service performance.
- b. Has the Postal Service undertaken an analysis of the data generated by Delivery Confirmation and/or Signature Confirmation service to determine the requirements or changes necessary to make the data “statistically representative” for Parcel Select? Please provide such an analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the Delivery Confirmation and/or Signature Confirmation service data “statistically representative.”
- c. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by Delivery Confirmation and/or Signature Confirmation service “statistically representative” for Parcel Select? Please explain.

OCA/USPS-117. Please refer to the Postal Service’s Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part, “Currently, 498 publishers have registered 2,169 publications in the ePUBWATCH system, which tracks problems with Periodicals mail.”

- a. How many publishers are currently registered in the ePUBWATCH system?

- b. How many publications are currently registered in the ePUBWATCH system?
- c. Please confirm that the data generated by ePUBWATCH system is “statistically representative” for Periodicals Mail. If you do confirm, please provide the statistically representative results for Periodicals Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:
  - i. Has the Postal Service undertaken any analysis of the data generated by the ePUBWATCH system to determine the requirements or changes necessary to make the data “statistically representative” for Periodicals Mail? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the ePUBWATCH system data “statistically representative.”
  - ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by ePUBWATCH system “statistically representative” for Periodicals Mail? Please explain.

OCA/USPS-118. Please refer to the Postal Service’s response to OCA/USPS-103 in Docket No. R2001-1, and the attachments thereto. For Fiscal Year (FY) 2002, 2003, 2004, and the available quarters of FY 2005, please provide the ODIS-based percent and frequency (i.e., “known delivery days” volume) delivered within 1 to 20 days for

- a. Parcel Post;
- b. Bound Printed Matter;

- c. Media Mail; and
- d. Library Mail.