

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 DOUGLAS F. CARLSON
(DFC/USPS-54-60)
(June 2, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DFC/USPS-54-60, submitted on May 19, 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 INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-54. Please refer to the response to DFC/USPS-28. For each quarter in FY 2002, FY 2003, and FY 2004, please provide the overall overnight, two-day, and three-day EXFC scores and the overnight, two-day, and three-day EXFC scores for mail not destined to post-office boxes.

RESPONSE:

**EXFC On-Time Service Performance,
By Quarter, FY 2002-2004**

Year	Quarter	Service Standard		
		Overnight	Two Day	Three Day
2002	1	93%	82%	72%
	2	94%	82%	74%
	3	94%	86%	83%
	4	94%	89%	88%
2003	1	94%	90%	88%
	2	95%	88%	83%
	3	95%	91%	89%
	4	95%	91%	90%
2004	1	95%	90%	85%
	2	95%	91%	88%
	3	96%	92%	91%
	4	95%	92%	91%

As noted in the response to DFC/USPS-28, EXFC service performance data is not aggregated for "mail not destined to post-office boxes." The service performance data for mail destined to post-office boxes provided in response to DFC/USPS-28, as indicated in that response and the response to DFC/USPS-55, are not statistically reliable.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-55. Please refer to the response to DFC/USPS-28. Please explain why service performance to post-office boxes differs from service performance to addresses other than post-office boxes, and please provide documents describing plans or efforts to address this disparity.

RESPONSE:

The post office box reporter sampling is not meant to be used as a separate sampling but is rather a subset of the complete EXFC panel. The post office box sampling is not a valid sampling method, in and of itself, and it is not statistically reliable as a separate measurement.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-56. Please refer to the response to DFC/USPS-13. Please estimate the percentage of addresses during the time when Docket No. R2000-1 was being litigated to which the Express Mail network was designed to deliver Express Mail on Sundays and holidays.

RESPONSE:

The requested information is not available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-57.

- (a) Please confirm that Express Mail sent between some addresses is not transported by air.
- (b) Please describe the characteristics of the situations in which Express Mail sent between some addresses is not transported by air.
- (c) Please confirm that Express Mail sent between some addresses is transported by commercial airplanes not operated by FedEx.
- (d) Please describe the characteristics of the situations in which Express Mail sent between some addresses is transported by commercial airplanes not operated by FedEx.
- (e) Please explain why the limitations of the FedEx network would cause the Postal Service to cease delivering all Express Mail on Sundays and holidays in some ZIP Codes containing street addresses if some of the Express Mail would be transported without using FedEx airplanes even if the FedEx network were in operation on the applicable day of the week.
- (f) Please explain how the Postal Service transports Express Mail to the ZIP Codes for which the Postal Service still provides delivery of Express Mail on Sundays and holidays.
- (g) Please explain how the Postal Service decided in which ZIP Codes to discontinue delivery of Express Mail on Sundays and holidays and in which ZIP Codes to continue delivery of Express Mail on Sundays and holidays.
- (h) Please provide documents relating to the Postal Service's determination of the public's need for Express Mail delivery on Sundays or holidays.
- (i) Please provide documents relating to or discussing the effect on the public of a reduction in the number of ZIP Codes to which Express Mail would be delivered on Sundays and holidays.
- (j) Please identify alternatives to Express Mail for the public to use to achieve delivery of mail on Sundays and holidays.

RESPONSE:

- (a) Confirmed.
- (b) Express Mail is transported via other than air transportation where existing surface transportation is available and is service-responsive.
- (c) Confirmed.
- (d) Express Mail may be transported by commercial airplanes not operated by FedEx on days that the FedEx network does not operate, or when the Express Mail contains mailable matter not accepted on the FedEx network.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

(e) Unreliable and/or unavailable commercial air operations as well as problematic highway routings on the weekend negatively affected the ability to continue to support Sunday and holiday delivery to some ZIP Codes. Other operational issues were considered such as, but not limited to, ability to provide local transportation, available staffing and delivery personnel, and proximity of the addresses to the processing and distribution centers.

(f) The Postal Service transports Express Mail committed for Sunday and holiday delivery by commercial air and surface routings that have been demonstrated to provide reliable and timely service.

(g) The decisions to include or exclude individual ZIP Codes for Sunday and holiday delivery were based upon the existence of reliable transportation to the destinating processing and distribution centers, availability of local transportation, available staffing and delivery personnel, and proximity from the processing center.

(h) Documents describing the Postal Service's determination of a need for Express Mail, including for delivery on Sundays and holidays, may be found in Commission proceedings concerning the establishment of Express Mail (Express Mail was established as a permanent mail class in October 1977, though it was introduced as an experimental service beginning in June 1970). For the last three decades, Express Mail has met the needs of many by providing delivery on Sundays and holidays.

(i) No such documents have been found.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

(j) Express Mail is the only service provided by the Postal Service that provides for Sunday or holiday delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-58. Please refer to the response to DFC/USPS-13.

- (a) For an average origin ZIP Code on a weekday mailing date that does not immediately precede a holiday, please provide the average number of ZIP Codes to which Next Day Service is available.
- (b) For an average origin ZIP Code on a Saturday mailing date, please provide the average number of ZIP Codes to which Next Day Service is available.
- (c) For an average origin ZIP Code on a weekday mailing date that does not immediately precede a holiday, please provide the average number of addresses to which Next Day Service is available.
- (d) For an average origin ZIP Code on a Saturday mailing date, please provide the average number of addresses to which Next Day Service is available.

For this interrogatory, data for an average origin ZIP Code may be calculated by adding the number of ZIP Codes to which Next Day Service is available for each origin ZIP Code nationwide and then dividing this sum by the total number of ZIP Codes. If a different calculation is used to define an average origin ZIP Code, please explain the calculation.

RESPONSE:

(a)-(d) Because of the number of network nodes (over 42,500 originating and destinating ZIP Codes) and continually changing local and network transportation schedules, there is no meaningful way to determine “an average origin ZIP Code” and its corresponding number of Next Day commitments. In addition, FedEx, commercial air, and surface transportation schedules change regularly. These changes can affect all commitments associated with them.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-59. Please refer to the response to DFC/USPS-6. Please explain whether Express Mail is considered delivered on-time to a post-office box if a signature for the item is required and if the Postal Service places a notice of attempted delivery, such as a Form 3849, in the customer's post-office box after the last time on that day in which the Postal Service provides retail or other service that would allow the customer to pick up the item (e.g., a delivery attempt at 2:20 PM in a post office whose retail window and pick-up services ended at 2:00 PM).

RESPONSE:

Delivery of Express Mail addressed to a post office box is attempted when a notice is placed in the box. In the example cited in your question, if the notice is placed in the post office box after retail or other pickup services end, this would constitute a service failure.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON

DFC/USPS-60. Please refer to the response to DFC/USPS-13. Please estimate the percentage of ZIP Codes during the time when Docket No. R2000-1 was being litigated to which the Express Mail network was designed to deliver Express Mail on Sundays and holidays.

RESPONSE:

The requested information is not available.