

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

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Docket No. R2005-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
[OCA/USPS-55-59]

The United States Postal Service hereby provides its responses to the above-listed interrogatories of the Office of the Consumer Advocate, filed on May 20, 2005.

The interrogatories are stated verbatim and are followed by the responses.

A partial response to OCA/USPS-60 is forthcoming.

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

**OCA/USPS-55**

What measures will the USPS put in place to facilitate the purchase of the proposed single piece First-Class stamps so that:

- a. The wait time in postal lines is reduced, and
- b. Sufficient single piece First-Class stamps will be available when the new rates go into effect.

**RESPONSE**

- a-b. The Postal Service has not yet begun the process of determining what steps it may take to facilitate retail purchase of postage stamps implementing rate changes that may come from this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

**OCA/USPS-56**

Upon implementation of the proposed Docket No. R2005-1 rates, what type of “grace” period does the Postal Service offer its customers prior to returning a mail piece for insufficient postage?

**RESPONSE:**

Please see the response to OCA/USPS-55. As a matter of policy, the Postal Service typically offers no grace period.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

**OCA/USPS-57**

If the proposed Docket No. R2005-1 rate change is implemented on a Sunday, and a customer deposits mail into a USPS mail receptacle on that same Sunday using the former postage rate,

- a. Is the mail piece going to be processed and delivered to its destination? If not, please explain fully.
- b. Is the mail piece going to be returned to the originator? If your response to this interrogatory is affirmative, please provide the USPS's average cost to return to the originator of the mail piece for insufficient postage: (1) a First-Class letter and (2) a First-Class parcel weighing 13 ounces or less.

**RESPONSE:**

- a. Yes. Relative to other days of the week, much less mail is deposited in USPS collection boxes on Sundays. Scheduled Sunday collection is very rare.  
  
Otherwise, Sunday collection can occur in the unusual circumstances when a box is observed on that day to be overflowing. When Sunday collection occurs, or on the occasion of the first scheduled collection on the Monday following a Sunday rate change, it is usually not possible to tell whether the letters in the box were deposited before or after the rate change took effect. Some or all could have been deposited after the last pickup before Sunday. Accordingly, the letters are treated as if they were deposited before the change took effect.
- b. See the response to part (a).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

**OCA/USPS-58**

As noted in Docket No. C2001-3, the USPS downgraded several First-Class Mail Zip Code pairs from 2 day delivery to 3 day delivery.

- a. Subsequent to 2001, has the USPS conducted any transportation cost studies to evaluate the savings resulting from those down grades? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.
- b. Subsequent to 2001, has the USPS analyzed the consistency with which deliveries are made to those areas that were downgraded? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.

**RESPONSE:**

- a. No. Since cost savings were not a motivation for the changes, the Postal Service has not sought to study what their cost impact may have been.
  
- b. No analysis has been performed. Attention has been focused on other projects.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

**OCA/USPS-59**

In previous dockets including Docket No. C2001-3, the USPS indicated that in 2000 and 2001 there was a shift away from air transportation to ground transportation.

- a. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus using ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- b. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting First-Class Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- c. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting Priority Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- d. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting Express Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- e. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by air transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.
- f. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

**RESPONSE:**

- a. The Postal Service understands this question as requesting any studies or analyses of the overall cost benefits of using air transportation versus ground transportation. As such, the answer is no. The Postal Service considers it obvious that, in general, air transportation has advantages over ground transportation in areas of speed, and ground transportation has advantages over air transportation in areas of cost. The Postal Service has conducted some

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO OCA INTERROGATORY**

specific analyses, which it considers to be highly commercially sensitive, in regard to specific origin-destination city pairs.

**RESPONSE to OCA/USPS-59 (continued):**

- b-d. Please see response to (a), above.
- e. The Postal Service understands this question as requesting any studies or analyses of the overall average pound-mile cost of transporting mail by air transportation. As such, the answer is no. Many air transportation expenses are not based on pound miles. For example, the relevant costs for mail that is flown on FedEx are not based on pound miles. Transportation charges for mail that is flown within Alaska are set by the Department of Transportation. The Postal Service has conducted some specific analyses, which it considers to be highly commercially sensitive, in regard to specific origin-destination city pairs that are flown on air other than FedEx.
- f. No. The Postal Service has not, to this date, concluded that attempting to gather the data that would be necessary to complete a valid study or analysis of the average pound-mile cost of transporting mail by ground transportation would be an optimal use of its resources.