

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-119-133)  
(June 6, 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-119. Please refer to the response to DFC/USPS-4, and the table “EXFC On Time Percentage by Service Standard.” For FY 2004, please rank order and discuss the most important factors causing the Postal Service’s failure to achieve the:

- a. Overnight service standard for 4.73 percent of overnight committed First-Class Mail;
- b. Two-Day service standard for 8.69 percent of two-day committed First-Class Mail; and
- c. Three Day service standard for 11.16 percent of three-day committed First-Class Mail.

OCA/USPS-120. Please refer to the response to DFC/USPS-4.

- a. Please provide a table showing the First-Class Mail EXFC Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.
- b. Please provide a table showing the First-Class Mail ODIS-RPW or ODIS On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
- c. Please provide a table showing First-Class Mail ODIS-RPW or ODIS Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

OCA/USPS-121. Please refer to the response to DFC/USPS-5, and the table “PETE On Time Percentage, by Service Standard.” For FY 2004, please rank order and discuss the most important factors causing the Postal Service’s failure to achieve the:

- a. Overnight service standard for 7.31 percent of overnight committed Priority Mail; and

- b. Two-Day service standard for 10.56 percent of two-day committed Priority Mail.

OCA/USPS-122. Please refer to the response to DFC/USPS-5.

- a. Please provide a table showing the Priority Mail ODIS-RPW or ODIS On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
- b. Please provide a table showing the Priority Mail ODIS-RPW or ODIS Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.
- c. Please provide a table showing the Priority Mail PETE On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
- d. Please provide a table showing Priority Mail PETE Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

OCA/USPS-123. Please refer to the response to DFC/USPS-6.

- a. For Express Mail Post Office to Addressee and Post Office to Post Office, please provide a table showing the On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
- b. For Express Mail Post Office to Addressee and Post Office to Post Office, please provide a table showing the Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

OCA/USPS-124. Please refer to the response to DBP/USPS-10(b), regarding retail window services on Sundays in some cities. Consider three postal customers that utilize retail window services where available on Sundays in some cities. One customer

enters a Next Day Express Mail piece, the second enters a Second Day Express Mail piece, and the third enters a Priority Mail piece to a ZIP Code with a 3-day service standard. There are no holidays on Monday, Tuesday, or Wednesday.

- a. For the Next Day Express Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Monday, satisfying the Next Day service standard. If you do not confirm, please explain.
- b. For the Second Day Express Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Tuesday, satisfying the Second Day service standard. If you do not confirm, please explain.
- c. For the Priority Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Wednesday, satisfying the 3-day service standard. If you do not confirm, please explain.

OCA/USPS-125. Please refer to the response to DFC/USPS-44. For FY 2001 through FY 2004, please provide the percentage of First-Class Mail destined to one-day, two-day, and three-day delivery areas according to the First-Class Mail service standards.

OCA/USPS-126. For FY 2004, with respect to each category or type of First-Class Mail:

- a. Please provide the percent and number of pieces that are misdelivered. Please identify the data system or the source of the data used.

- b. Please provide the percent and number of pieces that are damaged. Please identify the data system or the source of the data used.
- c. Please provide the percent and number of pieces that are lost. Please identify the data system or the source of the data used.

OCA/USPS-127. For FY 2004, with respect to Priority Mail:

- a. Please provide the percent and number of pieces that are misdelivered. Please identify the data system or the source of the data used.
- b. Please provide the percent and number of pieces that are damaged. Please identify the data system or the source of the data used.
- c. Please provide the percent and number of pieces that are lost. Please identify the data system or the source of the data used.

OCA/USPS-128. For FY 2004, with respect to Return Receipt service, please provide the number of days for the return receipt to be:

- a. received by mail, where the return receipt is requested at the time of mailing;  
and
- b. received electronically, where the return receipt is requested at the time of mailing.

OCA/USPS-129. With respect to CONFIRM service for First-Class Mail,

- a. Please confirm that the data generated by CONFIRM service is “statistically representative” for First-Class Mail. If you do confirm, please provide the statistically representative results for First-Class Mail. If you do not confirm, please provide the results currently available to track service performance.

- b. 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 First-Class Mail? Please explain. 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.”
- 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 CONFIRM service “statistically representative” for First-Class Mail? Please explain.

OCA/USPS-130. With respect to CONFIRM service for Periodicals Mail,

- a. Please confirm that the data generated by CONFIRM service 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.
- b. 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 Periodicals Mail? Please explain. 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.”
- 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

CONFIRM service “statistically representative” for Periodicals Mail? Please explain.

OCA/USPS-131. The following interrogatory concerns CONFIRM service.

- a. Please confirm that the following data elements are available from CONFIRM service: (i) date of mailing, (ii) date of delivery, (iii) date of first handling at a P&DC, (iv) date of delivery sortation at a P&DC, (v) origin ZIP Code, and (vi) destination ZIP Code.
- b. Please identify any other data elements available from CONFIRM service.

OCA/USPS-132. Please refer to the response of the United States Postal Service to OCA/USPS-T10-2(c) – (d), redirected from witness Waterbury.

- a. Refer to the sentence that states, in part, “there has been a continuous *increase* in Registry pieces delivered on rural routes, as opposed to a continuous *decrease* in national level (RPW) Registry pieces.” (emphasis original). What is causing the continuous increase in Registry pieces delivered on rural routes? Does it follow from the quote above that there is a continuous *decrease* in Registry pieces delivered on city delivery routes? Please explain. Are postal customers on rural routes more likely to use Registered Mail than postal customers generally? Please explain. Or, are postal customers on rural routes “average” users of Registered Mail, but there are an increasing number of postal customers moving into areas served by rural routes? Please explain.
- b. Please confirm that the unit cost of C/S 10 (rural carriers) increased by 249.5 percent between BY 2000 and FY 2004. (See the response of witness

Meehan to OCA/USPS-T10-1(a), redirected from witness Waterbury.) If you do not confirm, please explain.

OCA/USPS-133. Please refer to Table 1, below, entitled “Expected Actual Delivery Day for Express Mail Based Upon Next Day or Second Day Service Commitment and Day of Mailing,” which is intended to be used as a guide to consumers. Please confirm that Table 1 and the notes thereto are accurate. If you do not confirm, please explain and make whatever changes are deemed appropriate to improve the accuracy of this guide.

TABLE 1  
Expected Actual Delivery Day for Express Mail Based Upon Next Day or Second Day Service Commitment and Day of Mailing

Table 1.A.  
Day of Mailing (prior to published "Drop-Off" Times)

Service Commitment <sup>1/</sup>	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
NEXT DAY <sup>2/</sup>	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY	MONDAY

Table 1.B.  
Day of Mailing (prior to published "Drop-Off" Times)

Service Commitment <sup>3/</sup>	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
SECOND DAY <sup>4/</sup>	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	MONDAY	TUESDAY	TUESDAY
"2nd Delivery Day"	THURSDAY	FRIDAY	SATURDAY	MONDAY	TUESDAY	WEDNESDAY	WEDNESDAY

Notes:

- <sup>1/</sup> Next Day Express Mail service is determined by the ZIP Code of mailing (origin ZIP Code) and the ZIP Code of receipt (destination ZIP Code), referred to as the ZIP Code "pair."
- <sup>2/</sup> Next Day Express Mail Service is available to many ZIP Code "pairs" for items mailed during the week, Monday through Friday. For items mailed on Saturday, or where the "Next Day" falls on a federal holiday, Next Day Express Mail service to the same ZIP Code "pairs" may not be available. In such circumstances, customers will be informed that the item can be mailed as Second Day Express Mail service (see Table 1.B.).
- <sup>3/</sup> Second Day Express Mail is never delivered on Sundays or federal holidays.
- <sup>4/</sup> To determine the expected actual delivery day for Second Day Express Mail service: do not count the day of mailing or any days that are Sundays or federal holidays. The expected actual delivery day will be the "2nd Delivery Day," as shown in Table 1.B. Consequently, the "2nd Delivery Day" could be 3 or 4 calendar days after the day of mailing if the "Second Day" or the intervening day is a Sunday or a federal holiday. For example, a Second Day Express Mail item mailed on Friday would "normally" be delivered on Monday, the third calendar day. That same item mailed on Friday would be delivered on Tuesday, the fourth calendar day, where Monday is also a federal holiday.