

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 6/6/2005 4:12 pm  
Filing ID: 44650  
Accepted 6/6/2005

Postal Rate and Fee Changes]  
Pursuant to Public Law 108-18]

DOCKET NO. R2005-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-127-143]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

June 6, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528  
R20051Wint127

---

DBP/USPS-127                      Please refer to your response to DBP/USPS-88. [a] Please confirm, or explain if you are unable to confirm, that the data provided in response to Interrogatory DBP/USPS-65 subpart d in Docket R2001-1 is still correct for the 20 referenced offices. [b] Please provide an estimate as to the number of additional post offices that would be added to the listing if a complete study was made. [c] Since most of the offices appear to be in Alaska, has the District Manager of the Alaska District been queried as to the offices in his District that do not have 6-day a week mail service? If not, why not? If so, what was the response?

DBP/USPS-128 Please refer to your response to OCA/USPS-57 subpart a. [a] In the example provided, please confirm, or explain if you are unable to confirm, that the mailpiece would be postmarked on Monday. [b] Please explain how a Postal Service employee at the destination post office would be able to distinguish between this letter and another letter that was mailed and postmarked on Monday.

DBP/USPS-129 Please refer to your response to DBP/USPS-8 subpart g. [a] Since there appears to be a significant difference in the percent on time for the 19 different categories of mailpieces, please provide the details and specifics of each of the 19 categories of mailpieces [A through S], such as dimensions, weight, method of addressing, etc. [b] Since the CDLTR mailpiece category C seems to have an on time record of a letter and significantly better than a card, please provide a sample of this type of mailpiece. [c] Please provide a tabulation of the EXFC scores by letter, card, and flat shapes for overnight, 2-day, and 3-day mail for each quarter of the past three years.

DBP/USPS-130 Please refer to your response to DBP/USPS-8 subpart g. [a] Please advise why in general cards seem to have a lower EXFC score than letters and that flats seem to have a lower EXFC score than both letters and cards. [b] Please describe the steps taken to improve the EXFC scores of all three shapes of mail and in particular cards and flats.

DBP/USPS-131 Please refer to your response to DBP/USPS-8 subpart g. [a] Please advise why in general 2-day mail seems to have a lower EXFC score than overnight mail and that 3-day mail seems to have a lower EXFC score than both overnight and 2-day mail. [b] Please describe the steps taken to improve the EXFC scores of all three categories of mail and in particular 2-day and 3-day mail.

DBP/USPS-132 Please provide copies of any reports issued by the USPS OIG, GAO, Inspection Service, or area offices in the past five years which relates to as it relates to any actions that may have been taken by the field to affect EXFC scores.

DBP/USPS-133 Please refer to your response to DBP/USPS-80 subpart c. Please provide any statistics or estimations of the percentage and/or number of official USPS Registered Mail articles that are lost in transit.

DBP/USPS-134 Please refer to your response to DBP/USPS-81 subpart a. Please confirm that the wording of the last clause of the second sentence is correct.

DBP/USPS-135 Please refer to your response to DBP/USPS-69 subpart d. Please confirm that the seventh word - "(d)" - of the first sentence is correct.

DBP/USPS-136 Please refer to your response to DBP/USPS-69. Please confirm, or explain if you are unable to confirm, that in general Express Mail which is deposited at any time during the day so long as it is prior to the cutoff time will be handled in a similar manner.

DBP/USPS-137 Please refer to your response to DBP/USPS-69. Please confirm, or explain if you are unable to confirm, that an overnight Express Mail article mailed at 8 AM and delivered at 11 AM the following day is just as on time as one that is mailed at 5 PM and delivered at 11 AM the following day yet one will be tallied as 1.125 days and the other will be tallied as 0.75 days.

DBP/USPS-138 Please refer to your response to DBP/USPS-69. Please confirm, or explain if you are unable to confirm, that an overnight Express Mail article mailed at 8 AM and delivered on time at 11 AM the following day will be tallied as 1.125 days while another article mailed at 5 PM and delivered late at 1 PM the following day after the guaranteed time will be tallied as 0.8333 days.

DBP/USPS-139 Please refer to your response to DBP/USPS-69. Please confirm, or explain if you are unable to confirm, that if every mailer of an Express Mail article mailed the article four hours earlier than they had in the past, it would show an increase in days to deliver of 0.1667 and have no real effect on the processing or evaluation of the mail performance while if every article was delivered four hours later on the following day, it would show that same 0.1667 increase but would drastically increase the number of failures to meet the guaranteed delivery time.

DBP/USPS-140 Please refer to your response to DBP/USPS-69. Please advise why hours from acceptance to delivery are utilized to calculate the days to delivery as opposed to using actual days to delivery.

DBP/USPS-141 Please refer to your response to DBP/USPS-69. Please advise why there is such a large difference in days to delivery between 4 days and greater than 4 days [I note that the days to delivery for 0 through 4 days the whole number of the value is equal to the number of days in all 75 instances].

DBP/USPS-142 Please refer to your response to DBP/USPS -6 subparts f, k, l, m, and q. If the wording was changed from "Must" to "Should the guidelines be", would your answer be different?

DBP/USPS-143 Please refer to your response to DBP/USPS-6 subpart r. The first and second bullet items of the direct testimony of witness Potter appear to indicate percentage guidelines. Please advise.

---

---

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin June 6, 2005

---

---