

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-134-139)
(June 8, 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-134. Please refer to the response to OCA/USPS-63, regarding the volume of Post Office to Addressee Express Mail derived from the Product Tracking System (PTS).

- a. Please confirm that the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS used to calculate the 4.4 percent noted in response to DBP/USPS-25 is 52,946,54 (2,329,666 / 0.044). If you do not confirm, please explain and provide the correct number.
- b. Please explain and reconcile the difference between the FY 2004 Post Office to Addressee volume of 54,383,250 from the Express Mail Billing Determinants and the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS.
- c. Please explain why the Postal Service used the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS rather than the total volume of Post Office to Addressee from the FY 2004 Express Mail Billing Determinants (USPS-LR-K-77) in calculating the percentage of delivery failures.

OCA/USPS-135. Please refer to the response to OCA/USPS-64, where it states "The Postal Service does not maintain information regarding the cause of particular Express Mail delivery failures."

- a. Is it fair to conclude from the response that the Postal Service is satisfied with the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.

- b. Is it fair to conclude from the response that the Postal Service is not interested in trying to determine the most important factors causing the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.
- c. Is it fair to conclude from the response that the Postal Service has no idea as to the most important factors causing the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.

OCA/USPS-136. Please refer to the response to OCA/USPS-65, regarding Express Mail delivery failures.

- a. For FY 2003, please confirm that the total volume of Post Office to Addressee Express Mail derived from the PTS is 53,387,207 (2,776,522 / 0.053). If you do not confirm, please explain and provide the correct number.
- b. Please provide the total volume of Post Office to Addressee Express Mail from the FY 2003 Express Mail Billing Determinants.
- c. For the period from late August 2002 to September 30, 2002, please confirm that the total volume of Post Office to Addressee Express Mail derived from the PTS is 5,023,796 (271,285 / 0.054). If you do not confirm, please explain and provide the correct number.

OCA/USPS-137. Please refer to the response to OCA/USPS-66(b), regarding Express Mail refunds and potential monetary exposure.

- a. Please confirm that the figures \$46.8 million for FY 2003 and \$49.2 million for FY 2002 represent potential monetary exposure. If you do not confirm, please explain.

- b. Please provide the total amount of Express Mail refunds for FY 2002 and FY 2003.

OCA/USPS-138. Please refer to the response to DBP/USPS-81(b). For FY 2002 and FY 2003, please provide the number of articles of numbered insured mail, the number of claims resolved, and the number of claims paid.

OCA/USPS-139. Refer to the response to DFC/USPS-5, regarding Priority Mail service standards.

- a. For FY 2002, FY 2003, and FY 2004, please provide the number of 3-digit ZIP Code pairs that were:
 - 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.
- b. For FY 2002, FY 2003, and FY 2004, please provide the percentage of Priority Mail volume associated with the 3-digit ZIP Code pairs that were:
 - 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.