

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 DAVID B. POPKIN  
(DBP/USPS-96-98, 100-103(A), 104, 106)  
(June 14, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-96-98, 100-103(a), 104, and 106, filed on May 31, 2005. Objections to DBP/USPS-99 and DBP/USPS-103(b)-(d) were filed on June 10, 2005. Responses to DBP/USPS-105 and 107 are forthcoming.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**DBP/USPS-96.** Please refer to your response to DBP/USPS-68. [a] Do the total volume figures utilized include those articles that are mailed with other than the single receipt forms referenced in the six subparts of DBP/USPS-68 such as might occur with a firm mailing book or manifest or other multiple entry? [b] If so, please recalculate or estimate the percentages of the single receipt forms that are postmarked or otherwise validated by the Postal Service at a retail window or any other place of mailing. [c] Please provide a breakdown of the method of presentation to the Postal Service of the total volume of Delivery Confirmation articles.

**RESPONSE:**

[a]. Yes, except [b] and [c] which were single piece only and [f] for which no bulk/manifest data are available.

[b]. Here are the re-estimated percentages:

[a] Certified Mail Receipt PS Form 3800:	23.7%
[d] Insured Mail Receipt PS Form 3813/3813-P:	99.9%
[e] Certificate of Mailing PS Form 3817:	89.0%

[c].

<b>Electronic Delivery Confirmation</b>		
WebTools - Inc. Click-N-Ship	9.69%	47,891,726
WebTools – Packages	2.17%	10,724,979
FC Parcels – Manifest	6.71%	33,163,414
Packages – Manifest	<u>81.43%</u>	<u>402,458,538</u>
	<b><u>100.00%</u></b>	<b><u>494,238,656</u></b>
<b>Retail Delivery Confirmation</b>		
FC Parcels – Retail	13.65%	13,663,924
Packages – Retail	16.16%	16,176,484
Priority – Retail	<u>70.19%</u>	<u>70,261,598</u>
	<b><u>100.00%</u></b>	<b><u>100,102,006</u></b>

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**DBP/USPS-97.** Please refer to your response to DBP/USPS-51. Please confirm, or explain if you are unable to do so, that Postal Service insurance may only be obtained for loss or damage to merchandise and may not be obtained for loss or damage to contents that are required to be sent as First-Class Mail or Express Mail.

**RESPONSE:**

Postal Service insurance provides indemnity for damaged, lost, or rifled merchandise.

Insurance is not available on items required to be sent as First-Class Mail. Express Mail

insurance provides for document reconstruction, as well as indemnity for merchandise.

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**DBP/USPS-98.** Please refer to your response to DBP/USPS-51. Please provide an estimate of the percentage of the number of Registered Mail articles that are sent by Registered Mail where the primary reason for doing so is the level of security that is provided by Registered Mail.

**RESPONSE:**

The Postal Service does not know the percentage of Registered Mail users for whom the level of security is the primary reason for using the service.

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**DBP/USPS-100.** Please refer to your response to DBP/USPS-59. I am confused by your inability to confirm DBP/USPS-59 and then state that the DMM states that the name and address must be included on the receipt form. Please explain.

**RESPONSE:**

The original interrogatory, DBP/USPS-33, referenced forms 153, 152, and 3813/3813-P, which do not require the name and address be filled out. As a result, the Postal Service did not confirm that the name and address must be included for all of the forms.

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**DBP/USPS-101.** Please refer to your response to DBP/USPS-61. Based on the attachments that explain the delivery time to and from Hawaii and your response to subpart e where you state that it is generally the same for other offshore locations, it would appear that the Service Standards CDrom information for Hawaii and other offshore locations of 10 days or less for Standard Mail is incorrect and the CDrom should not show data for Standard Mail as it does not shown data for Package Services.

- [a] Please explain and discuss.
- [b] Does Alaska meet the same criteria as an "other offshore location" as specified in your response to DBP/USPS-61 subpart e?
- [c] If not, please explain the processing of mail to and from Alaska in a similar manner to the data provide for Hawaii.

**RESPONSE:**

- (a) The suggestion not to include information on service standards to offshore locations for Standard Mail, as is the case for Package Services, seems logical. The Postal Service will undertake a review to consider possible revision of the CD-ROM to implement that change.
- (b) Yes.
- (c) N/A

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**DBP/USPS-102.** Please refer to your response to DBP/USPS-67 subpart a. [a] Please confirm, or explain if you are not able to do so, that if I mail a letter on Saturday that is delivered on the following Monday it will be tallied as being delivered in one day, regardless of the service standards for that letter. [b] Please confirm, or explain if you are not able to do so, that if I mail a letter on Saturday before a three-day weekend due to a Monday holiday that is delivered on the following Tuesday it will be tallied as being delivered in one day, regardless of the service standards for that letter. [c] Please advise the percentage of mail destined to a location that has a 2-day delivery standard that is delivered on the next calendar day. [d] Please advise the percentage of mail destined to a location that has a 3-day delivery standard that is delivered on the next calendar day and the percentage delivered on the second calendar day. [e] For a recent EXFC report, please advise the days-to-delivery for both 2-day and 3-day delivery standards. [f] For the same EXFC report as used in subpart e, calculate the days-to-delivery for both 2-day and 3-day delivery standards if the criteria for days-to-delivery were changed to take into consideration the delivery standard [namely, if the letter is delivered on the first delivery day following one or two non-delivery days, utilize the delivery standard as the days to delivery if the delivery standard would have been one of the non-delivery day[s] prior to the day of delivery].

**RESPONSE:**

[a] Confirmed.

[b] Confirmed.

[c] 5.35 percent.

[d] Next calendar day: 0.01 percent; second calendar day: 11.97 percent.

[e] Recent data were filed in the April 29, 2005, response to DFC/USPS-4b.

[f] There appears to be a question here. However, we are unsure what it is. Please restate the question and we will see if we can comprehend the restatement and formulate a response.

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**DBP/USPS-103.** Please refer to your response to DBP/USPS-49 subparts e and f.

- (a) Please provide a listing of the "many factors" and "local area considerations" that are taken into account in determining whether to provide Sunday/holiday delivery or not.
- (b) Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing or not providing service on Sunday/holiday.
- (c) Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing or not providing regular overnight service.
- (d) Please provide copies of any directives, guidelines, etc. of the Headquarters EMCCB as they relate to providing service by 12 noon vs. 3 PM at an office.

**RESPONSE:**

(a) The availability of reliable commercial air operations and highway routings, the ability to provide local transportation, and available staffing and delivery personnel are some of the factors considered.

(b)-(d) Objection filed.

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**DBP/USPS-104.** Please refer to your response to DFC/USPS-13. You state that the FedEx network is not in operation on some federal holidays.

- (a) Please advise the holidays in the past year that it was in operation.
- (b) Was "normal weekday" overnight Express Mail provided on those holidays?
- (c) If not, why not?

**RESPONSE:**

(a) Columbus Day (October 11, 2004)

Veterans Day (November 11, 2004)

Martin Luther King Day (January 17, 2005)

Presidents Day (February 21, 2005)

(b) No.

(c) On federal holidays the Postal Service provides Express Mail delivery service to ZIP Codes that receive Sunday/Holiday delivery.

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**DBP/USPS-106.** Please advise what each of the C/S 1 through C/S 20 represent for Registered Mail Cost by Segment and Component in USPS-LR-K-5.

**RESPONSE:**

A description of what each of the C/S 1 through C/S 20 represent can be found in USPS-LR-K-1, Summary Description of USPS Development of Costs by Segments and Components, FY 2004.