

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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

DOCKET NO. R2005-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-159-166]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory 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 15, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051CCint159

DBP/USPS-159 Please refer to your response to DBP/USPS-85 subparts c and d. [a] In the example that you provided in your response to subpart b, you indicated that the CFS unit has until 5 PM on Tuesday to process the mail. The question that I had is that once the mail has been processed [I assume that means that the yellow label has been affixed with the new address], that the mail will be dispatched to the addressee. The question is will First-Class Mail that is destined from the P&DC for overnight delivery receive overnight delivery and mail that is destined to the 2-day delivery standard area from that P&DC receive delivery on the 2nd day and mail destined to the 3-day area receive delivery on the 3rd day [assuming no non-delivery days are involved]? [b] You indicate that First and Standard letters will be combined into a single group and that First, Periodicals, and Standard flats will also be

combined into a separate single group. When those separate combined groups of mail are dispatched from the P&DC, what level of service will they receive? Will they be separated into the separate classes of mail by the P&DC and dispatched as appropriate to that class of mail or will they be sent as a single group - if so, what type of dispatch will they receive?

DBP/USPS-160 Please refer to your response to DBP/USPS-85 subpart a. [a] What do PARS and CIOSS stand for? [b] Please explain what types of offices participate in this program and please explain how the program operates and differs from the CFS procedures.

DBP/USPS-161 Please refer to your response to DBP/USPS-86 subpart b. Please advise the DMCS section that contains the authority for this \$1 fee.

DBP/USPS-162 Please refer to your response to DBP/USPS-86 subpart c. [a] Please advise the approximate time frame that it takes for these letters to be issued after the COA has been filed. [b] Are these letters issued for every COA regardless of the means used for filing it? If not, please explain which are not and why they are not sent.

DBP/USPS-163 Please refer to your response to DBP/USPS-100. Please confirm, or explain if you are unable to confirm, that USPS Forms 153, 152 and 3813 provide a place for the mailer to provide the name and address of the addressee.

DBP/USPS-164 Please refer to your response to DBP/USPS-102 subpart d. Please explain and provide the origin and destination [either in a generic or, if possible, in a specific way] of the 0.01 percent of 3-day standard mail that is delivered on the next calendar day.

DBP/USPS-165 Please refer to your response to DBP/USPS-102 subpart f. In the response to DFC/USPS-4 subpart b, the Postal Service stated that for FY 2004 EXFC the days to delivery for mail destined for the 2-day delivery area was 1.97 days and for the 3-day delivery area was 2.83 days. I assume that these two numbers were calculated using the policy that assumes delivery time of the day of delivery to be the earlier of any non-delivery day when the letter is physically delivered on the first available delivery day following the non-delivery day[s]. For example, a letter mailed on Saturday and delivered on Monday will be counted as one day. My original interrogatory as well as this follow-up is asking the Postal

Service to recalculate these two numbers if the Postal Service were to utilize the days-to-delivery as no less than the delivery standard unless the letter is physically delivered in less time than the delivery standard. For example, a letter mailed on a Saturday to a 2-day delivery area and delivered on Monday would be tallied as 2 days; a letter mailed on a Saturday to a 3-day delivery area and delivered on Tuesday [because of a Monday holiday] would be tallied as 3 days. Please contact me if there are any questions.

DBP/USPS-166 Please refer to your response to DBP/USPS-104. Which level of transportation was utilized on the 4 referenced holidays. I realize that to obtain physical delivery on the holiday, the office has to be on the list of the 13,000 some ZIP Codes that have Sunday/holiday delivery. In other words, for Express Mail sent from my local area on the day prior to the holiday, would it have received holiday delivery throughout the country [the normal weekday TRANSPORTATION network] or would it have been limited to the regular weekend transportation network?

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 15, 2005
