

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-183-202]

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 20, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051FFint183

DBP/USPS-183 Please refer to your response to DBP/USPS-107 subpart g. [a] If an Express mail article was sent from Englewood NJ 07631 to Bronx NY 10470 on Saturday June 25th prior to the cutoff time at Englewood, what date and time is guaranteed for delivery? [b] If an Express mail article was sent from Bronx NY 10470 to Bronx NY 10470 on Saturday June 25th prior to the cutoff time at Bronx, what date and time is guaranteed for delivery? [c] If an Express mail article was sent from Englewood NJ 07631 to Bronx NY 10470 on Monday June 27th prior to the cutoff time at Englewood, what date and time is guaranteed for delivery? [d] Please confirm that the USPS website states that the articles referred to in subparts a and b will be "2 Delivery Days". [e] Please confirm that a literal interpretation of "2 Delivery Days" would indicate delivery on Tuesday June 28th since the first delivery date after mailing the

article would be Monday June 27th and the second delivery date after mailing the article would be Tuesday June 28th. [f] How does a user of the USPS website determine whether the guaranteed delivery time will be 12 noon or 3 PM in the instances where the time is shown as "2 Days" or "2 Delivery Days"? [g] If the response to either or both subparts a and b is Tuesday June 28th and the response to subpart c is Tuesday June 28th, please explain why mail deposited on Monday will have equal or better service than mail deposited in Englewood on Saturday? [h] If the response to subpart b is Tuesday June 28th, please explain why mail deposited on Saturday will not be delivered on the next delivery date of Monday June 27th at the same local post office. [i] Please explain any responses you are unable to confirm.

DBP/USPS-184 Please refer to your response to DBP/USPS-107 subpart i. [a] Please advise whether the PTS database makes use of the collection box locations and collection times as shown in the Collection Point Management System [CPMS]. [b] If a post office makes a change in collection times and obtains a new collection box label, how long does it take for the new collection times to appear in the [1] CPMS, [2] PTS, and [3] the 1-800-ASK-USPS database? [c] Same as subpart b except if the collection box is removed from service. [d] Please advise the interrelationship between the various databases maintained at District level or above that show and/or make use of collection box locations and/or collection box times. This explanation should provide the times for the various databases to be updated and show revised data.

DBP/USPS-185 Please refer to your response to DBP/USPS-107 subpart j. [a] Please advise how the processing of Express Mail deposited in a blue collection box is processed and how the service guarantee is determined. [b] Are there some local Districts that have removed Express Mail collection boxes on the assumption that mailers may use regular collection boxes. [c] Is this an acceptable action? [d] If so, why?

DBP/USPS-186 Please refer to your response to DBP/USPS-107 subpart k. Please provide a copy of a sample Express Mail Collection Box Decal and explain where on this decal a mailer may determine the standards that are associated with collection by that time.

DBP/USPS-187 Please refer to your response to DBP/USPS-107 subpart k. [a] Please confirm that if a mailer is in line at a retail service window at a post office at a time that is just prior to the Express Mail cutoff time and that by the time that the mailer has their

Express Mail article processed at the window it is a minute or two after the cutoff time, that in virtually all cases the mail will be dispatched in the same dispatch had it been mailed a few minutes earlier [prior to the cutoff time] but the service standards as shown on the POS terminal will be different. [b] Please confirm that if an Express Mail collection box shows a 4 PM collection time that the collection of the mail will be made at a time that is at 4 PM or shortly thereafter and that the mail will return to the post office even later than the time of collection and that the mail will be processed for dispatch in a similar manner as if it had been turned in at a retail window at a time which is even later. [c] Please confirm that if I mail an article prior to the collection time as shown on an Express Mail collection box but there is a problem with the collection being made and/or the collector returning to the post office and/or the article being properly processed at the post office upon the carrier's return that the article does not receive delivery by the time that is guaranteed for mail that would have been properly processed then it would count as a failure and a refund would be available. [d] Please explain any subparts you are unable to confirm. [e] Please explain how in the situations proposed in subparts a and b of this interrogatory and with subpart m of DBP/USPS-107 how the postal clerk would be able to determine the standards that existed at an earlier time. [f] Must an APC mail drop be provided with a collection schedule? [g] If not, why not?

DBP/USPS-188 Please refer to your response to DBP/USPS-107 subpart l. [a] If a post office utilizes an Express Mail collection box, must it make at least one collection each day [at least on Monday through Saturday except holidays] that will allow the mail to receive the full available dispatch schedule that is available at the opening of the retail service window? [b] If not, why not? [c] Must all collection times shown on the Express Mail collection box result in receiving the full available dispatch schedule that is available at the opening of the retail service window? [d] If not, why not? [e] If one or more collection times that are shown on the decal on an Express Mail collection box will result in a reduced level of guaranteed service areas or times, how will the mailer be aware of that condition? [f] Please provide any regulatory references [DMM, POM, or other references] that describe the times required for collection at an Express Mail collection box.

DBP/USPS-189 Please refer to your response to DBP/USPS-95. Please confirm, or explain if you are unable to confirm, that the 4-state barcode will not show the specific address and/or ZIP Code but will only show a unique sequence number that the equipment that reads the 4-state barcode will read and then go to a centralized database to determine the address

information for processing that mailpiece, in other words, that if I could manually decode a specific 4-state barcode, I would not be able to check or determine the ZIP Code or other address information.

DBP/USPS-190 Please refer to your response to DFC/USPS-75. Your response appears to indicate that the National CMBS data may be missing certain data elements and/or data when compared to the District file. Other than perhaps being up to one month outdated, please advise what data elements and fields and/or data are contained in the District file that are not contained in the National CBMS file [or the new CPMS database].

DBP/USPS-191 Please refer to your response to DFC/USPS-76. Please explain what particular parts of your response to DFC/USPS-58 explain the term "average origin ZIP Code".

DBP/USPS-192 Please refer to your response to DFC/USPS-76. Please confirm, or explain that if you are unable to confirm, that

[a] 10001 ZIP Code provides 24-hour a day, 365/6-days a year window service.

[b] 10001 is the main facility of the New York NY post office.

[c] The New York NY post office is the largest post office in the country.

[d] New York City is the largest city in the country.

[e] New York City is a major financial and business area of the country.

[f] New York City is probably in the center of the largest population and business center that stretches from Boston to Washington.

[g] New York City has local access to three major airports [JFK, LGA, and EWR]

[h] New York City is in the Eastern time zone giving it a time advantage over other parts of the country.

[i] Please advise the criteria that determine an "average origin ZIP Code". [j] Please advise how you chose 10001 to be THE "average origin ZIP Code" in the country. [k] Please explain why you believe 10001 to be an "average origin ZIP Code". [l] Please explain the difference between using 10001 vs. 10199 as an origin ZIP Code.

DBP/USPS-193 Please refer to your response to DFC/USPS-76. Please advise how many total addresses there are in the United States and the method that was utilized to

determine the number of addresses that corresponded to the ZIP Codes that were referenced in the response to subparts a and b.

DBP/USPS-194 Please refer to your response to DFC/USPS-76 subpart b. Please advise whether your response of 8,830 ZIP Codes takes into account both the availability of transportation to that ZIP Code as well as that ZIP Code being on the list of those offices that provide Sunday/holiday delivery.

DBP/USPS-195 Please refer to your response to DFC/USPS-76. [a] Please confirm, or explain if you are unable to confirm, that the Sunday/holiday delivery for 070-073 contains ZIP Codes in the range of only 010 to 227 and that all of these ZIP Codes are serviced by surface transportation. [b] Please advise the nominal distance corresponding to surface transportation. [c] Please provide a breakdown similar to that provided in the response provided in DFC/USPS-76 subparts a and b for Express Mail deposited in a 070-073 post office showing both the total breakdown for all ZIP Codes as well as a separation of those that are in the 010 to 227 ZIP Code range vs. those that are outside that range.

DBP/USPS-196 Please refer to your response to DFC/USPS-76. Please provide a copy of the Express Mail directory for 10001.

DBP/USPS-197 Please refer to your response to DFC/USPS-76. Please provide a breakdown of the responses to subparts a and b that fall into the ZIP Code range of 010 to the highest ZIP Code in the 20001 to 24599 range that has Sunday/holiday delivery vs. those that fall outside that range for mail deposited in 10001.

DBP/USPS-198 Please refer to your response to DBP/USPS-41. [a] Does a postmaster have the discretion of providing post office box delivery service only five days a week [also less any holidays and/or days around a holiday that are not an official holiday such as Thanksgiving Friday]? [b] If so, what is the regulatory authority for providing less than six days a week delivery? [c] Please specify any conditions where customers having street delivery will receive mail on a day when a post office box customer will not have delivery service. [d] If six days a week delivery service is required [other than official holidays] must the post office place incoming mail into the boxes? [d] If six days a week delivery service is required [other than official holidays] must the post office provide access to the post office box

at a time after which Saturday's incoming mail has been placed into the post office box? [d] If six days a week delivery service is required [other than official holidays] must the post office make arrangements to allow for post office box customers to have the ability on Saturday to pick up accountable mail and articles that are too large for the box?

DBP/USPS-199 Please refer to your response to DBP/USPS-109. Please provide any information that will allow for evaluating the original interrogatory such as the availability of the service, the cost of providing each of the services, the weight sent by each of the services, the number of pieces sent by each of the services, or a best estimate by those that are responsible for this choice of services.

DBP/USPS-200 Please refer to your response to DBP/USPS-109. Are hard copy Express Mail directories available at every post office? How should customers obtain a copy and what action should be taken if the local office does not have a copy to provide?

DBP/USPS-201 Please refer to your response to DBP/USPS-122. [a] Please confirm, or explain if you are unable to confirm, that the list of 800 some post office that have Express Mail delivery service on a Sunday or Holiday applies only to expected delivery on Sunday or holiday and does not apply to delivery on a Saturday [unless it is a holiday]. [b] If one goes to the website and evaluates a shipment of Express Mail on Friday June 24th from Portland OR 97201 to Astoria OR 97103 it states that it will be delivered Next Day by 3 PM and the USPS website also shows that Astoria does not have retail window hours on a Saturday. This does not appear to agree with your response to subparts a and b of DBP/USPS-122. Please explain. [c] If in fact, a mailer is not able to send Express Mail on a Friday for overnight delivery [or on a Thursday for a 2-day area for scheduled delivery on a Saturday such as from Ketchikan AK 99901 to Astoria OR 97103] to a post office box address where there are no retail window access why isn't a similar listing provided to the public to allow for proper evaluation?

DBP/USPS-202 Please refer to your responses to DBP/USPS-123 and 124 subpart b. Since I have a copy of a December 25, 2004 listing of Sunday and holiday delivery offices showing the 13,000 some odd list of post offices that have Sunday and holiday street delivery and 800 some odd list of offices that have Sunday and holiday post office box delivery, please explain why the preparation and distribution of this listing has been terminated.

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 20, 2005
