

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-127-143)  
(June 20, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-127-143, submitted on June 6, 2005.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO DAVID B. POPKIN INTERROGATORY

**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?

**RESPONSE:**

(a) The data is still correct for 17 of the 20 offices cited. The offices of Chitina, Eagle, and King Cove are currently receiving shipments of Express Mail six days per week.

(b) As noted in the response to DBP/USPS-88, a complete study would produce a list that is substantially similar in both size and scope to the one provided in response to DBP/USPS-65(d) in Docket No. R2001-1. A quantitative estimate of how the number of offices on that list would change cannot be provided because no complete study has been undertaken.

(c) The District Manager has been queried and responds that the service being provided is a longstanding traditional service to very unique and remote areas that are not experiencing any growth. Therefore, an appropriate level of service is being provided, and there are no initiatives under consideration to change the present level of service.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

- [a] If it is collected on Monday, that would be the presumption.
- [b] It is unlikely that they would.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

[a] Not all of the differences are significant. In any event, see the objection to this interrogatory filed on June 16, 2005, and the revised response to DBP/USPS-8(g) filed on June 14, 2005.

[b] See the objection filed on June 16, 2005.

[c] A response is forthcoming.

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**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.

**RESPONSE:**

The data would suggest that the Postal Service is able to process and deliver letters more efficiently than cards and flats. Recent and current EXFC score differentials between letters and cards are not very significant and do not currently trigger any plans on the part of the Postal Service to devote extraordinary mail processing attention to efforts designed to result in improved Card processing and delivery. Relative to letters automation, flats automation is a recent technological development. Although it might never be as extensively deployed as for letters, flats automation is expected to result in speedier and more efficient sortation and delivery of flats over time.

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**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.

**RESPONSE:**

[a-b] In general, the greater the number of handlings and transfers, the greater the utilization of transportation, the greater the number of cross-docking and loading and unloading a mail piece must undergo in or between processing hubs from origin and destination, the more potential bottlenecks and delays it can be exposed to as it competes for processing during critical windows. Overnight or “turn-around” mail has less exposure to such potential delays. The Postal Service takes steps to review and improve mail processing generally by training managers to deploy personnel and maintain and utilize equipment optimally and to manage transportation in relation to the execution of various mail processing tasks necessary to meet operational objectives. It is a dynamic process, subject to constant tinkering at all levels of the organization. EXFC data are one of the tools used in helping managers to understand the degree to which there is room for improvement in what they do.

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**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.

**RESPONSE:**

None are known to exist.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-133.** Please refer to your response to DBP/USPS-80 subpart c. Please provide any statistics or estimations on the percentage or number of official USPS Registered Mail articles that are lost in transit.

**RESPONSE:**

The Inspection Service tracks lost USPS Registered Mail by case, rather than individual articles. In FY 2004 there were 149 cases, each of which involves one or more USPS articles of Registered Mail lost in transit. Please see the response to DBP/USPS-47c for the total number of USPS articles in FY2004.

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**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.

**RESPONSE:**

Not confirmed. A revised response to DBP/USPS-81 was filed on June 17, 2006. The clause in question should have referred to articles, not claims.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

Not confirmed. The response should reference part (a) of DBP/USPS-69. Appropriate erratum will be filed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

The cutoff times at individual acceptance units are designed to connect with a planned set of dispatches. If Express Mail is accepted earlier in the day for the same dispatch as Express Mail accepted at the cutoff time, the handling would be similar.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

Confirmed. Please note that this data is not a measure of service performance.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

The Postal Service believes that measurement by hours is a more accurate way to determine the average time of delivery for Express Mail than is measurement by whole day increments.

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**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).

**RESPONSE:**

This appears to be the result of averaging all values above 4 combined with apparent data entry errors among the >4 statistics.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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?

**RESPONSE:**

If the questions were changed by substituting the word "Must" with the phrase "Should the guidelines be", the answers in response to subparts(f), (k) and (q) would be in the form of a request that the questions be further modified to make sense. In contrast, the responses to subparts (l) and (m) would be changed to: "Perhaps, if one believed in symmetry for its own sake. Otherwise, for the reasons discussed in Docket No. C2001-3, where these questions could be said to have had some relevance, the answer remains in the negative."

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**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.

**RESPONSE:**

This question is puzzling. The first two bulleted items in Docket No. N89-1, USPS-T-2, appear at page 3 of Appendix A. Neither indicates percentage guidelines. There are no bulleted items on the pages of (Docket No. N89-1) USPS-T-2, cited in response to DBP/USPS-6(r).