

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 POPKIN [DBP/USPS- 154-157]
(June 24, 2005)

The United States Postal Service hereby provides its responses to above-listed interrogatories of David Popkin, filed on June 10, 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 UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN**

DBP/USPS-154. Please refer to your response to DBP/USPS-5. Please confirm, or explain if you are unable to confirm, that there are two separate and different Table 4 for PQ 1 FY 2005 and that the first of them should read Table 5 for PQ 2 FY 2005.

RESPONSE:

Confirmed. A revision to DBP/USPS-5 was filed on June 22, 2005.

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

DBP/USPS-155. Please refer to your response to DBP/USPS-5. Please confirm, or explain if you are unable to confirm, that there are many entries that are shown to the nearest integer or nearest tenth and that all of these entries are improperly truncated, namely, an entry such as 1.9 should really be shown as 1.90 and an entry such as 2 should really be shown as 2.00 and that all entries are expressed to the nearest one-hundredth of a percent.

RESPONSE

Confirmed, that due to spreadsheet formatting, the data shown in the response to DBP/USPS-5 are not all displayed to the same number of decimal places. A value of, for example, 2.00 is displayed as 2. Similarly, a value of 1.90 is displayed as 1.9. However, the data are correct to two decimal places.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-156. Please refer to your response to DBP/USPS-5. [a] Please confirm, or explain if you are unable to confirm, that for the first table of delivery times, the overnight percentage for the nation is 95.09% plus 2.01% and minus 2.63%; for 2-day delivery is 89.77% plus 5.51% and minus 10.66%; and for 3-day delivery is 83.17% plus 7.15% and minus 9.68% when the data for out of the 48 continental states is omitted. [b] Please explain and discuss why in general the performance for overnight mail is better than 2-day and 3-day delivery and why 2-day delivery is better than 3-day delivery. [c] Please explain and discuss why the spread [maximum value minus the minimum value] of this data is much greater for 2-day and 3-day mail than it is for overnight mail.

RESPONSE:

[a] Not confirmed. It appears that the example given is for Quarter 2 FY 2005. The actual score summary is copied below, along with the column headings.

EXFC Service Performance Scores (Response to DBP/USPS-5)

Service Standard Area	Performance Cluster	Destination Percent On Time	Destination +/- Range for Percent On Time	Destination Average Delivery Days	Destination +/- Range for Average Delivery Days
Overnight	Nation	95.09	0.10	1.1	0
Two-Day	Nation	89.77	0.21	2.01	0.01
Three-Day	Nation	83.17	0.27	2.99	0.01

For this example, the on-time service performance for overnight mail is 95.09 percent plus-or-minus 0.10 percent; the on-time service performance for two-day mail is 89.77 percent plus-or-minus 0.21 percent; and the on-time service performance for three-day service standard mail is 83.17 percent plus or minus 0.27 percent. As indicated by the table, EXFC measures service performance for the Caribbean, Honolulu and Alaska performance clusters. Therefore, the national data includes test mail sent to destinations outside the 48 contiguous states.

[b] See the response to DBP/USPS-131.

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RESPONSE to DBP/USPS-156 (continued):

[c] The range within any sampling is a function of the size of the sampling. The larger the sample, the smaller the range will be. This is mathematically derived from the sampling size. The Overnight sample is larger than the other samples.

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DBP/USPS-157. Please refer to your response to DBP/USPS-5. Please explain and discuss the extent to which upper management stresses, including by means of pay administration, the need to improve one's overnight score vs. 2-day and/or 3-day scores.

RESPONSE:

Maintaining and improving service performance is considered to be an important goal for Postal Service management and is incorporated into the compensation system for Postal Service managers.