

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-210-225]

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 27, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R200511lint210

DBP/USPS-210 Please refer to your response to DBP/USPS-121. Your response indicates that Post Office to Post Office [A-Label] Express Mail may be sent to 7200 post offices. The response to DBP/USPS-16 in Docket R2001-1 indicated that A-Label may be sent to all of 71 three-digit ZIP Codes. Evaluation of the 070-073 Express Mail Directory indicates that A-Label may be sent to part or all of at least [those three-digit prefixes that are not overnight are not known] 176 three-digit ZIP Codes [the directory indicates that, "Must check with local post office to determine valid shipment claim locations within a Zip Code area."]. [a] Please indicate when the level of service available to A-Label users was increased from that which existed to provide the response to Docket 2001-1 as to what is presently available. [b] Please indicate when the level of service available to A-Label users was changed from being

available to all ZIP Codes in a 3-digit range as was available in the R2001-1 response to only being available to certain 5-digit ZIP Codes within the 3-digit prefix as currently exists. [c] Many years ago there was a directory that listed all of the claim locations for A-Label Express Mail service. Is such a directory still available? [d] If not, how does a mailer determine which individual ZIP Codes are available to send A-Label for pickup? [e] If so, please provide a copy of the Directory. [f] If a Directory is not available, please provide a listing of the 7200 post offices that A-Label Express Mail may be sent to.

DBP/USPS-211 Please refer to your response to DBP/USPS-121. [a] I notice that the 070-073 Express Mail directory indicates that A-Label service is available to the 900 prefix and if I go to the USPS website, I notice that A-Label is available to 90001 and is not available to 90049. Short of entering all 99 individual ZIP Codes from 90001 through 90099, is there a way to determine the available pickup locations in the 900 ZIP Code prefix area? [b] If so, please explain how it would be accomplished. [c] Please advise how a mailer would obtain the local street address and window hours of the delivery address post office. [d] If there were 2 or more facilities that had the same 5-digit ZIP Code, please explain how a mailer would be aware of which facility the A-Label article was being sent to.

DBP/USPS-212 Please refer to your response to DBP/USPS-121. Please confirm, or explain if you are unable to confirm, that the USPS website provides a complete listing of all potential origin-destination ZIP Code pairs for the shipment of A-Label Express Mail and takes into account the availability of window hours on the scheduled day of delivery and at a point after 10 AM to allow for the claiming of the article.

DBP/USPS-213 Please refer to your response to DBP/USPS-121. [a] Please explain how the listing of the 7200 post offices was determined. [b] Please explain why A-Label Express Mail service is not available for delivery at any of the other remaining offices. For example, the USPS website shows that A-Label service is not available from Englewood NJ 07631 to Paramus NJ 07652 even though that is within the overnight service area for First-Class Mail. [c] Please confirm, or explain if you are unable to confirm, that A-Label Express Mail may be sent to these 7200 post offices from all post offices throughout the country [except for Military ZIP Codes] to arrive by 10 AM on either the overnight day or the second calendar day or in the event of non-window service day on the scheduled date of delivery, the delivery would occur on a later calendar day.

DBP/USPS-214 Please refer to your response to DBP/USPS-145. The third paragraph of your response provides information on how accountable mail would be delivered to an IRS facility or other government agency if there was only a single piece. Please confirm, or explain if you are unable to confirm, that for the seven IRS facilities and for most large government agencies in Washington, that it would be a rare instance that they would ever receive only a single piece of accountable mail and in most cases they receive considerably more pieces.

DBP/USPS-215 Please refer to your response to DBP/USPS-145. In your response you provide two separate procedures, Procedure 1 and Procedure 2. [a] Are you now able to indicate which of the two procedures is utilized at each of the seven IRS offices as well as with government agencies in Washington? [b] If so, please advise which procedure is utilized by each of the seven IRS facilities and by Washington DC in the case of government offices. [c] If so, please confirm, or explain if you are unable to confirm, that the procedure as provided on pages 3 and 4 of your response provides a complete and accurate response to the original interrogatory. [d] If not, please explain when the data will be provided as to the means of delivery of accountable mail to each of the seven IRS facilities and to government agencies in Washington. [e] The wording in explaining both Procedure 1 and Procedure 2 refers to the IRS. Please explain how it applies to mail addressed to government agencies in Washington.

DBP/USPS-216 Please refer to your response to DBP/USPS-145. [a] Please provide a copy of PS Form 3883. [b] Does PS Form 3883 provide a place for the addressee to sign to indicate receipt of the mail? [c] If so, please explain why the addressee's signature is obtained on PS Form 3849 and not on PS Form 3883. [d] Please confirm, or explain if you are unable to confirm, that PS Form 3849 has a place for indicating the number[s] of the accountable mail article[s]. [e] Please explain why no article numbers are placed on the PS Form 3849 that is signed by the addressee.

DBP/USPS-217 Please refer to your response to DBP/USPS-145. [a] Please confirm, or explain if you are unable to confirm, that the Postal Service provides a number of mail services that the mailer is able to request or allow for a waiver of signature on the mail delivery and that by doing so allows for the USPS delivery employee to, in effect, sign for the mailpiece in behalf of the addressee and that this request for waiver of signature is made by

the mailer and not by the addressee. [b] Please explain why an objective evaluation of Procedure 1 could not be considered as being similar to a waiver of signature procedure. [c] Please confirm, or explain if you are unable to confirm, that mailers of accountable mail that is sent to an addressee where the Postal Service utilizes Procedure 1 to complete delivery have not made a request for waiver of signature. [d] Please confirm, or explain if you are unable to confirm, that waiver of signature is not available for use with Certified Mail or with return receipts, either hard copy or electronic versions.

DBP/USPS-218 Please refer to your response to DBP/USPS-145. [a] Please confirm, or explain if you are unable to confirm, that when a mailer sends accountable mail to the IRS or another government agency that the purpose is to be able to prove that the addressee receive the mailpiece. [b] In the example provided in Procedure 1, please explain how a mailer who receives proof that the Postal Service indicates that the addressee has received the mailpiece is able to hold the addressee accountable for receiving the mailpiece. [c] Please provide information as to what arrangements exist between the Postal Service and the addressee that will allow a mailer to hold the addressee accountable for receiving a mailpiece that has been signed for by the Postal Service and not the addressee irrespective of the indication that may appear on the signature. [d] Please provide copies of any agreements that exist with respect to subpart c or which allow the Postal Service to act as an agent of the addressee to apply the addressee's signature to various postal forms.

DBP/USPS-219 Please refer to your response to DBP/USPS-145. [a] Please confirm, or explain if you are unable to confirm, that the existing USPS regulations require that the addressee sign for accountable mail prior to the transfer control of the mail from the Postal Service to the addressee. [b] Please explain the purpose of these regulations. [c] Please confirm, or explain if you are unable to confirm, that Procedure 1 does not allow compliance with these regulations.

DBP/USPS-220 Please refer to your response to DBP/USPS-145. Your response in providing the two procedures appears to be focused only on Certified Mail and the hard copy green return receipt card. Please provide similar information for the electronic return receipt and Delivery Confirmation.

DBP/USPS-221 Please refer to your response to DBP/USPS-145. Please advise the purpose of the red line that is placed in the right corner of Certified Mail items in Procedure 2.

DBP/USPS-222 Please refer to your response to DBP/USPS-145. [a] Please confirm, or explain if you are unable to confirm, that the existing USPS regulations require that return receipts are placed in the mail no later than the day after delivery of the underlying mailpiece and that return receipts are required to be evaluated for proper completion prior to returning them to the mailer. [b] Please explain the purpose of these regulations. [c] Please confirm, or explain if you are unable to confirm, that Procedure 2 does not allow compliance with these regulations. [d] Please advise what steps the Postal Service does to ensure compliance with the regulation that return receipts are required to be evaluated for proper completion prior to returning them to the mailer. [e] Does the Postal Service even check to see that all of the green return receipt cards are even returned for mailing to the sender? [f] If so, please explain the procedure; if not, why not?

DBP/USPS-223 Please refer to your response to DFC/USPS-32. [a] Please quantify the term "high volume addresses" that appears on line 5 of your response. [b] Please explain why delivering return receipt mail to high volume addresses does not allow for obtaining signatures on the green card before the mail is transferred to the recipient. [c] Please provide any guidelines, directives, memoranda, etc. that have been released in the past 5 years from Headquarters or Area offices with respect to providing proper service for accountable mail and/or return receipts. [d] Please provide any guidelines, directives, memoranda, etc. that have been released in the past 5 years from Headquarters or Area offices with respect to defining the term "high volume addresses".

DBP/USPS-224 Please refer to your response to OCA/USPS-175. [a] Please refer to your item #3 on page 1. By rural post office, do you mean a post office that has rural delivery service? [b] If not, please explain. [c] If a potential delivery point is within 1/4 mile of a rural post office and is either on the line of travel of a rural delivery carrier or is in an area covered by city delivery service, must they be provided delivery service? [d] If not, please explain.

DBP/USPS-225 Please refer to your response to OCA/USPS-175. [a] Please explain how a municipal government can pass local regulations that affect the operation of a federal government agency. [b] Do I understand your response that if a local government precludes me from receiving delivery service by the Postal Service that my only options are to pay for a post office box or to utilize General Delivery service. [c] If not, please explain. [d] Please describe the situation that exists in Garrett Park, Maryland.

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 27, 2005
