

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-158 AND 168)  
(July 7, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-158 and 168.

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-158.** Please refer to your response to DFC/USPS-64.

- (a) Please advise why you refer to the Express Mail piece as a "Next Day piece" since it will not be delivered for two days.
- (b) Please confirm, or explain if you are unable to confirm, that for determining the guaranteed delivery date and time for an Express Mail piece, the first step is to evaluate the transportation that exists from the office of mailing to the office of delivery based on the relationship of the time of mailing to the cutoff time for that date. The second step is then to determine that if the transportation that is available will provide delivery on a Sunday or holiday then the list of those offices that deliver on a Sunday or holiday (or post office boxes that are accessible on a Sunday or holiday in the event of mail addressed to a post office box) to determine if the guaranteed date of delivery will be the Sunday or holiday or will be deferred to the next delivery date after the Sunday and/or holiday.

**RESPONSE:**

(a) The reference to "Next Day" is misleading, and appropriate errata will be filed. In the situation posited in the response to DFC/USPS-64, the guarantee that would be indicated on Label 11-B would be "Second Day"; in other words, the retail computers do not quote a "next delivery day" guarantee.

(b) The guarantee of delivery for a particular Express Mail piece is based on the date and time in which the piece is entered, and the destination ZIP Code. As indicated in your question, the guarantee that a piece receives is predicated on its entry in relation to certain cut-off times at the acceptance unit that are designed to connect with a planned set of dispatches to the airport or wherever the Express Mail is processed, where it is subsequently handled based on the destination ZIP Code. The availability of Sunday/holiday delivery is also critical to the guarantee; the lack of Sunday/holiday delivery at a destination can cause the guarantee to be moved to the next delivery day.

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**DBP/USPS-168.** Please refer to your response to OCA/USPS-113.

- (a) Please advise who the contractor is that provides the EMVS service to the Postal Service.
- (b) Please provide the manual for EMVS similar to the one that was provided for the EXFC program.
- (c) Please provide the results of each of the quarterly tests that have been conducted. Please also provide the PTS data for the each of the elements in the EMVS data so that a comparison may be made as to the reliability of the PTS data.
- (d) In the response to DBP/USPS-73 and 74 et. al., the Postal Service appeared to state that there was no system for Express Mail that uses droppers and shippers similar to the EXFC and PETE systems. Based on the response to OCA/USPS-113, it would appear that an update or correction is required to a number of my interrogatory responses. Please advise and provide as appropriate.

**RESPONSE:**

(a) IBM Business Consulting Services.

(b) No manual exists for EMVS.

(c) Please see the attached spreadsheets. The EMVS Validation Report provides a comparison of what PTS and EMVS indicate are the percentage of mailpieces meeting the PTS service standard (the match rate indicates the percentage of pieces in which PTS and EMVS agree that the piece was either on-time or was late). The EMVS Service Standard Comparison Report provides the percentage of pieces where the PTS service standard matches the customer label service standard on a specific piece.

As noted in the response to OCA/USPS-113, EMVS is not tested during a holiday exclusion period. For this reason, there is no EMVS data for Quarter II of FY 2003, and the data for Quarters I and II of FY 2004 and 2005, respectively, are combined.

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(d) The interrogatories you reference discussed service performance measurement systems. The service performance measurement system for Express Mail is the Product Tracking System (PTS), which is not based on a test mail system such as EXFC or PETE using droppers or recipients. EMVS is a validation system, not a service performance measurement system.

EMVS Validation Report  
(Attachment to Response to DBP/USPS-168)

<b>Quarter</b>	<b>Number of Pieces</b>	<b>Overall Match Rate Between PTS and EMVS</b>
FY02 QIII	3414	95.0
FY02 QIV	3421	95.3
FY03 QI	3706	95.1
FY03 QIII	3569	96.6
FY03 QIV	3588	95.2
FY04 Q I and II	3647	95.3
FY04 Q III	3545	96.6
FY04 QIV	3578	96.3
FY05 Q I and II	3553	95.2

EMVS Service Standard Comparison Report  
(Attachment to Response to DBP/USPS-168)

<b>Quarter</b>	<b>Number of Pieces</b>	<b>Percentage of Pieces Where PTS and Customer Label Match</b>
FY02 QIII	4008	95.7
FY02 QIV	3990	96.1
FY03 QI	4291	97.1
FY03 QIII	3911	97.6
FY03 QIV	4021	97.9
FY04 Q I and II	4141	98.5
FY04 Q III	3946	98.4
FY04 QIV	4009	98.4
FY05 Q I and II	3950	98.8