

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-203-209)
(July 8, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-203-209, submitted on June 24, 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-203. Please refer to your response to OCA/USPS-119. Please explain the steps and methods that are taken by the Postal Service to reduce missed collections, such as but not limited to, collection box tests, scanning boxes on collection, downloading scanning results, follow-up on missed or early collections.

RESPONSE:

The Postal Service has deployed improved tools and initiated improved processes to reduce the incidence of missed collections pick-ups. Nationally, the Postal Service implemented the Collection Box Management System to supplement traditional collection box testing procedures. Locally, to improve the focus and accountability for collections, many managers have consolidated collections responsibilities on specific assignments. These operational changes have improved the management of collections programs.

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DBP/USPS-204. Please refer to your response to DBP/USPS-139. If days to delivery is not a measure of service performance, what is it a measure of and what uses does the Postal Service make of evaluating the data?

RESPONSE:

The days to delivery data is a measure of the time of delivery for Express Mail, and can be a good diagnostic indicator of the seriousness of any service issue.

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DBP/USPS-205. Please refer to your response to DBP/USPS-140. Please provide the specific advantages and disadvantages of calculating days to delivery on an hourly basis as opposed to using calendar days. Please also explain how it relates to whether the mail piece was delivered prior to or after the scheduled/guaranteed delivery time.

RESPONSE:

Express Mail is a product that is sensitive to the time of the day in which it is accepted and delivered. Thus, time of delivery data that is measured by whole day increments is not a useful indicator.

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DBP/USPS-206. Please refer to your response to DBP/USPS-141. Based on your response to DBP/USPS-141, it would appear that the chart provided in response to DBP/USPS-69 subpart g requires correction. Please provide an updated chart or explain why correction is not required.

RESPONSE:

No correction is necessary because the chart provided in response to DBP/USPS-69(g) reflects the available data in the form requested.

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DBP/USPS-207. Please refer to your response to DBP/USPS-143. There is a page which at the top states: "Document Name: Direct testimony Potter" and has a page number 16 at the bottom of the page. There are four bullet paragraphs on the page extending over to page 17 with three more bullet paragraphs. The first bullet paragraph shows a guideline of 1.5% if the dock to dock time is within three hours should be considered for overnight and the second bullet paragraph discusses two-day delivery areas if there is 0.5% of the facility's total originating volume. Please reevaluate your response.

RESPONSE:

In neither instance on page 16 of Docket No. N89-1, USPS-T-2, Appendix A, does a minimum volume, by itself, "mandate a higher level of service . . . ", to quote DBP/USPS-6(r). The volume minimums in each of the first two bulleted paragraphs on page 16 are used to identify "possible overnight" and "possible two-day delivery areas". (Emphasis in original.) Establishment of an overnight or a 2-day service standard is determined on the basis of other factors identified at the conclusion of each of the bulleted paragraphs.

Re-evaluation of the response to DBP/USPS-143 confirms that you mistakenly alluded to page 3 of Docket No. N89-1, USPS-T-2, Appendix A in the question. Re-evaluation of the response to DBP/USPS-6(r) confirms that that question was flawed by your misinterpretation of page 16, as described above.

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DBP/USPS-208. Please refer to your response to DBP/USPS-149 and OCA/USPS-135. You indicate that Postal Service field personnel are in the best position to identify and correct deficiencies. Interrogatory OCA/USPS-64 asked for a ranking and discussion of these evaluations by field personnel. Please provide the requested information.

RESPONSE:

The Postal Service believes that its response to OCA/USPS-64(b) was responsive to the question asked.

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DBP/USPS-209. Please refer to your revised response to DBP/USPS-5 filed on June 22, 2005. Please confirm, or explain if you are unable to confirm, that the only correction made to the original response relates to the heading on the top of each page that corrects the quarter to PQ 2 FY 2005 and that there were no corrections made to the individual data entries.

RESPONSE:

Confirmed.