

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-244-264]

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."

July 11, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528  
R20051MMint244

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DBP/USPS-244                      Please refer to your response to DBP/USPS-185 subpart a. Please confirm, or explain if you are unable to confirm, that when a mailer deposits an Express Mail article in a regular blue collection box that the service guarantee is based on the time that the mailpiece is processed when the collector returns to the postal facility.

DBP/USPS-245                      Please refer to your response to DBP/USPS-185 subpart a. Please confirm, or explain if you are unable to confirm, that when a mailer deposits an Express Mail article in a regular blue collection box that the mailpiece may possibly not be recognized by the collector during the route or upon return to the post office and will not be discovered until the

mail is processed at the P&DC [or other facility] and that the service guarantee will be based on the time that the mailpiece is ultimately processed.

DBP/USPS-246 Please refer to your response to DBP/USPS-185 subparts b through d. Your response appears to have misinterpreted the intent of the original interrogatory. My original intent was to inquire about the "wholesale" removal of Express Mail collection boxes on the assumption that mailers may use regular blue collection boxes and not what you appear to have responded to which appears to be the removal or addition of a specific Express Mail collection box based on the activity at that specific collection box. Please respond to the intent of the original subparts b through d.

DBP/USPS-247 Please refer to your response to DBP/USPS-186. Please confirm, or explain if you are unable to confirm, that the Express Mail Collection Box Decal does not "provide[s] the standards associated with the collection time for the Express Mail deposited in the collection box" but only provides a generic explanation of Express Mail service standards. Furthermore, the generic explanation provided does not take into account the changes in Express Mail service standards that provide delivery on the second delivery day or the third or fourth calendar day after mailing.

DBP/USPS-248 Please refer to your response to DBP/USPS-186. [a] Approximately what percentage of the collection box decals will show the 1-800-ASK-USPS / 1-800-275-8777 [or any other national number as opposed to a local telephone number for the local post office] as the number to call for local information? [b] Will the national call center be able to provide all of the information necessary to allow a mailer to determine the service standards that apply for Express Mail deposited in a given collection box, including, but not limited to, the time that the collector will return to the office, any collection times that occur prior to the final collection time<sup>1</sup>, whether the local office will utilize the collection time or the office scanning time as the determinant of the service standards, and obviously whether they have the information of Express Mail standards to begin with.

DBP/USPS-249 Please refer to your responses to DBP/USPS-191 and 192. Please provide all of the reasons why, when the requestor asked for data for an average origin ZIP Code and provided a method to calculate the average, the Postal Service decided to only

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<sup>1</sup> I understand that the national call center database only shows the final collection time for the day.

provide the data for a single ZIP Code [even though there are over 40-thousand ZIP Codes] and that the reasons why the 10001 ZIP Code was chosen as the one single ZIP Code to utilize to respond to interrogatories DFC/USPS-58 and DFC/USPS-76.

DBP/USPS-250            Please refer to your responses to DBP/USPS-192 subpart c. Please provide the standing of the New York NY post office as compared to all of the other post office offices in the country in [a] total revenue [b] total mail volume and [c] total Express Mail volume.

DBP/USPS-251            Please refer to your response to DBP/USPS-193. Please confirm, or explain if you are unable to confirm, that the data provided in response to DFC/USPS-76 subparts c and d was obtained by individually adding the number of individual addresses in each individual 5-digit ZIP Code for the specific ZIP Codes that are referenced in the response to subparts a and b.

DBP/USPS-252            Please refer to your response to OCA/USPS-26. Please confirm, or explain if you are unable to confirm, that the USPS Service Standards CD-ROM shows 2 to 9 days and not 2 to 10 days for Package Service and does not provide data for outside the 48 continental United States,

DBP/USPS-253            Please refer to your response to OCA/USPS-29. Please confirm, or explain if you are unable to confirm, that the USPS Service Standards CD-ROM shows 3 to 10 days and not 2 to 10 days for Standard Mail.

DBP/USPS-254            Please refer to your response to DBP/USPS-168 subpart b. Please reanswer the interrogatory if the word "manual" is taken to mean any written or printed instructions for the methods and/or procedures and/or reporting of the EMVS program.

DBP/USPS-255            Please refer to your response to DBP/USPS-168 subpart d. Please reanswer Interrogatories DBP/USPS 73-74, et. al if the words "service performance measurement systems" is taken to include not only service performance measurement systems but also include validation systems.

DBP/USPS-256 Please refer to your response to DBP/USPS-168. [a] Please provide a greater narrative of the explanation of the EMVS program. [b] Does the EMVS program utilize droppers and reporters? [c] Does the PTS system measure the same mailpiece as the EMVS? [d] Does the PTS system measure the same origin destination ZIP Code pair as the EMVS? [e] Exactly what does it mean when you state that the overall match rate between PTS and EMVS for FY02 QIII was 95.0? [f] Exactly what does it mean that the Percentage of Pieces where PTS and Customer Label Match is 95.7 for the same quarter? [g] Why are there different numbers of pieces for each of the quarters between the two categories?

DBP/USPS-257 Please refer to your response to DBP/USPS-168. If there are droppers and/or reporters in the EMVS program, [a] Please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have knowledge of or access to of the identity of droppers/reporters or the proposed location for dropping or receiving mail [prior to the delivery of the mailpiece]? [b] Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information.

DBP/USPS-258 Please refer to your response to OCA/USPS-118. Please discuss any reasons that exist for differences in the percentages for the different categories of Package services [PP/BPM/MM/LIB].

DBP/USPS-259 Please refer to your response to OCA/USPS-118. [a] Please explain how as much as 13% of the mail with a service standard of nine days<sup>2</sup> can be delivered overnight and which is faster than First-Class or Priority Mail service standards. [b] Please discuss the reliability of the data as a result of the condition noted in subpart a.

DBP/USPS-260 Please refer to your response to DBP/USPS-203. The original interrogatory requested the steps and methods to reduce missed collections as it relates to a minimum of four potential methods. [a] Please specifically discuss collection box tests the Postal Service makes and how it reduces missed collections. [b] Please specifically discuss scanning boxes on collection that the Postal Service does and how it reduces missed

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<sup>2</sup> The only Package Services in the continental 48 states that appear to have a 9-day service standard are those mailed in most of Arizona and sent to most of the Northeast states. The rest of the 48 continental states appear to have service standards of 8 days or less.

collections. [c] Please specifically discuss downloading scanning results that the Postal Service does and how it reduces missed collections. [d] Please specifically discuss follow-ups on missed or early collections that the Postal Service does and how it reduces missed collections. [e] Please specifically discuss any other steps and methods taken by the Postal Service to reduce missed collections other than other than implementing the CBMS and establishing dedicated collection routes [the two items provided in your response to DBP/USPS-203].

DBP/USPS-261 Please refer to your response to DBP/USPS-203. [a] Please advise when the Collection Box Management System was implemented and describe the system that was in place prior to its implementation. [b] Please specifically describe how the implementation of the Collection Box Management System helps the Postal Service reduce missed collections.

DBP/USPS-262 Please refer to your response to DBP/USPS-208. Please specifically describe the points which field personnel have identified as deficiencies in the on time delivery of Express Mail and the steps that are being taken to correct the deficiencies.

DBP/USPS-263 Please refer to your response to POIR NO. 9, Question 2. [a] Please confirm, or explain if you are unable to confirm, that this table does not include Priority Mail that is transported on the FEDEX system. [b] Please confirm, or explain if you are unable to confirm, that Zone 1 is up to 50 miles and Zone 2 is greater than 50 miles and up to 150 miles. [c] What percentage of the mail that is destined to Zones 1 and 2 has the same service standard for both Priority Mail and First-Class Mail. [d] What percentage of the First-Class Mail destined to Zones 1 and 2 is transported by air? [e] What volume of the First-Class Mail destined to Zones 1 and 2 is transported by air? [f] Please explain why over 15-percent of the Priority Mail that is carried by Commercial Air carriers is destined to Zones 1 and 2. [g] Please describe the type of mail and/or the types of destinations involved that requires commercial air transportation for destinations that are less than 150 miles apart.

DBP/USPS-264 Please refer to your response to OCA/USPS-186 to 193. [a] Please confirm, or explain if you are unable to confirm, that the nondenominated stamps that were issued for the 15¢ to 33¢ values had the letters "A" through "H" associated with them. [b] Please confirm, or explain if you are unable to confirm, that the nondenominated stamps that

were issued for the 34¢ and 37¢ values did not have letters associated with them but were of a design that matched the ultimately issued denominated version. [c] Please explain why the Postal Service abandoned the use of letters. [d] Please confirm, or explain if you are unable to confirm, that the use of a letter system rather than a design system will allow for a better determination of the value of a nondenominated stamp once it is well past the implementation period for that design. [e] Are there any plans to return to a letter system? [f] If not, why not?

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#### 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      July 11, 2005

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