

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-266-279]

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 18, 2005

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528
R20051QQint266

DBP/USPS-266 Please refer to your response to DBP/USPS-224 subparts c and d. Your response to subpart c was "reversed". The interrogatory asked if the potential delivery point was within 1/4 mile of the rural post office and either on the line of travel of a rural delivery carrier or in an area covered by city delivery service, then must that delivery point be provided delivery service? Your response was that if they were not provided carrier delivery they would be eligible for a free post office box. My question is the reverse of that, namely, if they are located close to the post office and on the line of travel, must they be provided carrier delivery? If not, please explain.

DBP/USPS-267 Please refer to your response to DBP/USPS-225. [a] Please confirm, or explain if you are unable to confirm, that the residents of Garrett Park who receive carrier delivery from a neighboring post office are "forced" to utilize an address for that post office rather than their "correct" Garrett Park address. [b] Please confirm, or explain if you are unable to confirm, that the residents of Garrett Park who receive mail delivery by going to the post office to pick up their mail will have a Garrett Park post office box address and will be required to pay for that box. [c] Please confirm, or explain if you are unable to confirm, that if the carrier delivery was not provided to a specific Garrett Park residence, then that resident could obtain their post office box free of charge.

DBP/USPS-268 Please refer to your response to DBP/USPS-221. In the description of Procedure 2 in the response to interrogatory DBP/USPS-145 on page 3 of 4, the red line is placed on the mail before it is taken to the IRS [first bullet] and before the green cards are removed [second bullet] and before the mail is actually delivered [third bullet]. [a] If the red line is supposed to indicate that the Certified Mail has been scanned, shouldn't the red line be placed after the article has been scanned? [b] If not, why not? [c] Please explain what would happen to a Certified Mail article that was observed not to have the red line on it at the time that the mail was being scanned and turned over to the IRS. [d] Please explain what would happen to a Certified Mail article that did not have the red line on it after the mail is turned over to the IRS.

DBP/USPS-269 Please refer to your response to OCA/USPS-176. On Page 2 of the New York City report AC-AR-03-005 it refers to a report of Delayed Express Mail at a Tampa, Florida Facility [Report Number DE-AR-01-003]. Please furnish a copy of that report.

DBP/USPS-270 Please refer to your response to OCA/USPS-176. The last page of the report shows a letter dated March 19, 2003 from the District Manager / Postmaster referring to Report Number AC-AR-03-DRAFT. [a] What changes were made between the Draft Copy of the report and the final copy? [b] Please provide information on the any follow-up activities that were conducted at the New York post office to ensure compliance with the requirement to ensure accurate delivery times are entered into the system.

DBP/USPS-271 Please refer to your response to OCA/USPS-176. It appears that the main thrust of the New York audit report is that the percentage of manual scans exceeds a

management objective of the 5 percent threshold and not the fact that the times for delivery that were being entered into the system were prior to the actual time that the article was delivered or attempted delivery. Please explain where in the report it shows that the incorrect delivery times were investigated or provide information on the investigation that was conducted of this.

DBP/USPS-272 Please refer to your response to DBP/USPS-227. I observe a significant number of failures of the CFS program to respond to a manual request for the RETURN SERVICE REQUESTED endorsement [since I receive a significant number of "next year" mailings that are returned as Forwarding Time Expired]. [a] Please explain how the CFS software will allow for evaluating whether the endorsement request has been complied with. [b] Please provide details of any quality controls that are conducted to ensure that the request has been complied with.

DBP/USPS-273 Please refer to your response to DBP/USPS-229. [a] Please confirm, or explain if you are unable to confirm, that the mailer of the birthday card in November 2002 with the endorsement RETURN SERVICE REQUESTED should have had the card returned to him or her with the new address of the recipient noted on it. [b] Please confirm, or explain if you are unable to confirm, that the mailer of the birthday card in November 2002 will not be aware of the new address [assuming that the only mailing is of an annual birthday card] until the November 2003 birthday card is mailed and subsequently returned as Forwarding Time Expired. [c] Please explain why the Postal Service will not make an effort to correct the problem that resulted by their failure to provide the address as was required by their own regulations on the mailing that was made in November 2002.

DBP/USPS-274 Please refer to your response to DBP/USPS-231. Your response provided information for an administrative employee and an Air Mail Facility manager. What distinction is made for [a] local Postmasters, [b] local post office supervisors [c] District Managers [d] managers at District offices [e] Area Vice Presidents and [f] managers on the Area office staff.

DBP/USPS-275 Please refer to your response to DBP/USPS-233. [a] Please confirm, or explain if you are unable to confirm, that the 772 parcels that were tallied in Quarter 2 for one ounce flat-rate boxes destined to the 8th Zone [where the box itself has a weight of

either 7.4 or 8.6 ounces] and the 1303 parcels that had a weight of three ounces and were also destined to the 8th Zone may have only been as the result of perhaps only one or two pieces that then get "multiplied" by a sampling factor to now indicating the 772 one ounce parcels and 1303 three ounce parcels. [b] Please provide the actual data that was tallied prior to the conversion to the data that was provided in the response to the POIR. [c] Please explain how the conversion was made. [d] You refer to USPS T-4 testimony. Please provide a reference to the specific page numbers and line numbers.

DBP/USPS-276 Please refer to your response to DBP/USPS-201 subpart b. [a] Approximately what percentage of the offices that do not provide general retail window hours on Saturday do make arrangements for post office box holders to pick up Express Mail articles that arrive on Saturday in a manner similar to that which is provided at Astoria OR? [b] Please explain why those offices that do not provide this service do not do so.

DBP/USPS-277 Please refer to your response to DBP/USPS-201 subpart c. [a] Please confirm, or explain if you are unable to confirm, that the retail computers at a service windows have been programmed to take into account all possible instances where Express Mail might arrive at a specific office at a time where the lobby may be closed or where retail window service may be closed prior to the service guarantee time on the scheduled day of delivery. [b] Does this computer programming take into account the difference between mail destined to a post office box and/or General Delivery vs. for carrier delivery? [c] Does this computer programming take into account the special arrangements of the type that you have indicated exist at Astoria OR? [d] Does this computer programming take into account an office that may close its accessibility for post office box delivery prior to the scheduled service standard for Express Mail [either 12 Noon or 3 PM] but the arrive of mail trips into this office occur prior to the closing of accessibility and there are no later trips?¹ [e] Please explain any no responses and the reasons therefore to subparts b, c, or d. [f] Will the delivery service standard as a result of the conditions noted in subpart a be noted when one checks the particular mailing conditions on the Postal Service website? [g] If not, why not? [h] Will the delivery service standard as a result of the conditions noted in subpart a be noted when one

¹ For example, an office has incoming mail at 8 AM only and accessibility to post office boxes and/or window pick-up service to 12 Noon, however, the service guarantee time is 3 PM. However, since the only arriving mail trip is at 8 AM, if an Express Mail article is going to arrive at this office it would have to be on the 8 AM trip and therefore accessibility prior to closing window service and/or access to the post office boxes would exist.

checks the particular mailing conditions on the Postal Service hard copy printed directories? [i] If not, why not?

DBP/USPS-278 Please refer to your response to DBP/USPS-117 subpart b. The original interrogatory asked for the rationale behind the decision that allows the Postal Service to claim on-time delivery of an Express Mail article at a post office box by placing a notice in the box by the guaranteed time even though the box holder either has no access to the box or the ability to claim the article from the post office personnel. [a] Your response to DBP/USPS-117 subpart b just referred to the response to DBP/USPS-82 and stated that "It is appropriate" when my interrogatory asked why it is appropriate. Please explain why it is appropriate for the Postal Service to claim on time delivery when the addressee does not and can not have access to the mailpiece and potentially will not have access to in for another three days.² [b] Please confirm, or explain if you are unable to confirm, that in order for the Postal Service to be able to claim on-time delivery of an Express Mail article being delivered by a city delivery, rural delivery, or highway contract route delivery carrier, the carrier must attempt to deliver the actual Express Mail article at the addressee's delivery location.

DBP/USPS-279 Please refer to your response to DBP/USPS-103 subparts b through d. Please provide a copy of the EMCCB process as noted on line two of your response.

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 18, 2005

² Under the conditions where the article is due to arrive on a Saturday but may not be claimed on Saturday and, in the case where Monday is a holiday, would not be able to be claimed until Tuesday.