

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-266-268, 270-271, 275-276, 278-279, 299)  
(August 1, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-266-268, 270-271, 275-276, 278-279, and 299.

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-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.

**RESPONSE:**

A partial objection to this interrogatory has been filed.

The question mischaracterizes the response to DBP/USPS-224(c), which correctly answers that whether carrier delivery would be required depends upon the specific, potential delivery point, thus exemplifying why the ¼ mile proximity is included in the descriptive list provided in response to OCA/USPS-175.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

A partial objection to this interrogatory has been filed.

- (a) Garrett Park residences who receive carrier delivery service from a neighboring office use an authorized city name and ZIP Code applicable to that route.
- (b) Customers whose delivery occurs through a post office box in the Garrett Park Post Office pay the appropriate fees.
- (c) Unable to confirm or disconfirm. No decision on this hypothetical situation has been made. Nor could a decision be made without further examination of the situation.

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**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.

**RESPONSE:**

(a)-(b) Yes. The red line is made when the piece is scanned as delivered. The other bullets are not intended to, and do not, specify that the red line is marked before each individual piece is scanned as delivered.

(c) This would not occur as the red line is marked only once the scan has been completed.

(d) The piece would be returned to a postal employee for scanning, and then brought back to the IRS employees.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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 followup 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.

**RESPONSE:**

(a) The only substantive change was that management's comments were incorporated and evaluated. Otherwise, some changes that did not affect the substance of the report were made, such as the deletion of some unnecessary general background information and some grammatical changes.

(b) See page 8 of the attachment to OCA/USPS-176 and the response to OCA/USPS-176(e).

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**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.

**RESPONSE:**

The issue of falsification is discussed throughout the OIG report provided pursuant to the OCA's request in OCA/USPS-176; for example, it is discussed in the last paragraph on page 3 of the report (page 5 of the attachment).

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

(a) Confirmed.

(b) The data include one piece weighing 2.3 ounces, and one piece weighing 0.5 ounces.

(c)-(d) Please refer to page 8, lines 2 through 4, of witness Pafford's testimony (USPS-T-4). Please also refer to USPS-LR-K-14, pages 14 through 16 (specifically, equations 2, 3, 4, and 7).

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**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.

**RESPONSE:**

(a) The Postal Service does not have such data.

(b) The decision to provide a service such as the one in Astoria OR is a local one, and is thus based on local considerations.

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**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.
- (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.

**RESPONSE:**

(a) As noted in the response to DBP/USPS-82(b), the Postal Service considers it to be appropriate to claim on-time delivery when the mailpiece arrives at the destination post office and delivery is attempted before the guaranteed time.

(b) As the response to DBP/USPS-82(a) indicates, confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE:**

This question mistakenly assumes that the reference to “the EMCCB process” in the response to DBP/USPS-103(b)-(d) is a reference to a document. The Postal Service was referring to the overall process by which changes to the Express Mail network are requested by the field and reviewed by the EMCCB at Headquarters.

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**DBP/USPS-299.** Please refer to your response to DBP/USPS-237, 238, and/or 239.

- (a) If the EXFC mailpieces containing PLANET and POSTNET barcodes are scanned during mail processing and the scan data for these pieces are excluded from the Confirm database, what database are they available in and who has access to that data base?
- (b) If they are in a database, what security exists to ensure that the data is only available to those few USPS employees previously identified as having access to EXFC internal information.
- (c) If they are not in a database, what use is made of them and why are the codes included in the first place?

**RESPONSE:**

A partial objection to this interrogatory has been filed.

As previously stated in the response to DBP/USPS-239, such scan data are routed exclusively to the EXFC contractor, who may or may not use a database. Beyond information already provided, and as previously noted, the Postal Service and most certainly its customers have no need to know exactly what security procedures are involved.