

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 POPKIN [DBP/USPS-308(a&b) and 309]
(August 29, 2005)

The United States Postal Service hereby provides its responses to above-listed interrogatories of David Popkin, filed on August 15, 2005. Each interrogatory is stated verbatim and is followed by the response. An objection to DBP/USPS-308(c) was filed on August 25, 2005.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN

DBP/USPS-308

Please refer to your response to DBP/USPS-297 subpart a. [a] Is a micrometer a standard piece of equipment that is provided to retail windows at post offices? [b] Is the method of utilizing a micrometer provided in the training of retail window clerks? [c] Please provide copies of any training material that explains the method of utilizing a micrometer.

RESPONSE:

(a&b) Almost all senders of single-piece mail use cards or envelopes manufactured by firms that either conform their products to meet postal machinability specifications or to indicate the potential need for additional postage. In the rare circumstances in which a minimum thickness issue is raised at a retail window, customers tend to defer to the judgment of the clerk, even if the clerk is not able, at the time, to offer an objective or scientific thickness measurement. Moreover, customers appear to approach window transactions, not as hobbyists overwhelmed by a compulsion to obsess about the application and enforcement of relatively obscure postal regulations, but as if their time has a value considerably greater than the expense of the rare application of an applicable nonmachinable surcharge, and as if they recognized that debating and hypothesizing with a retail clerk about an adverse minimum thickness determination consumed retail window resources that could otherwise be used to reduce the inconvenience to other postal patrons waiting in line for window service. This line of questioning suggests that there may be at least one customer who approaches these matters from a less conventional perspective.

As a consequence of the rarity with which the issue presents itself at retail windows, the Postal Service does not provide micrometers to each of its retail window clerks. On the other hand, micrometers are routinely employed by postal mail design analysts (MDAs) who interact with envelope and card manufacturers, and by bulk mail acceptance clerks, who verify the types of mailings that tend to be the almost exclusive source of pieces that raise concerns about minimum thickness. These

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RESPONSE to DBP/USPS-308 (continued):

postal personnel are provided instructions regarding the use of micrometers to measure mailpiece thickness. It can be presumed that window clerks with access to such devices are provided with the same instructions.

(c) Objection filed.

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DBP/USPS-309

Please refer to your response to DBP/USPS-297 subpart b. Please confirm, or explain if you are unable to confirm, that retail window clerks have the experience and judgment to be able to determine the difference in thickness of an envelope on the order of one or two thousandths of an inch without the benefit of any tools or measuring equipment.

RESPONSE:

Retail clerks have the training to be aware of and to know when to consult applicable nonmachinability specifications. They can be presumed to either possess or have access to the judgment and experience of colleagues with which to determine – in the very rare circumstances that arise – whether a piece presented for mailing is of such nonstandard character as to warrant an investigation to determine whether it is nonmachinable and subject to a surcharge. The Postal Service has no estimate of the percentage of its eagle-eyed retail window clerks who might be unable to determine the thickness of an envelope on the order of either one or two thousandths of an inch without the benefit of any tools or measuring equipment, but who can rely on previous experience with (or consultations with colleagues about) similar or identical mail pieces. Nor does the Postal Service have an estimate of the percentage of nonmachinable single pieces presented at the retail windows that are nonmachinable by virtue of missing the minimum thickness by either one or two thousandths of an inch. The Postal Service, however, is certain of the number of postal customers who needlessly obsess about such obscure matters in the context of postal rate case discovery.