

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN W. BERKELEY (OCA/USPS-T34-1-9)  
(June 14, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T34-1. This interrogatory seeks information on the Express Mail delivery guarantee. Please refer to your testimony at page 3, lines 6-8, where it states, "The guarantee is backed by a refund of total postage if delivery does not occur when specified by the Postal Service, with certain exceptions discussed below."

- a. For Post Office to Addressee Express Mail, are there any circumstances under which the Postal Service has refunded less than the total amount of Express Mail postage for delivery failures, i.e., where delivery does not occur by the guaranteed delivery date and time? Please explain.
- b. For FY 2005, please provide the total amount of refunded postage paid by the Postal Service for Post Office to Addressee Express Mail, as well as the amounts refunded separately for Next Day, 2 Day, and the Second Delivery Day.
- c. For FY 2005, please provide the total number of delivery failures for Post Office to Addressee Express Mail, as well as the number of delivery failures separately for Next Day, 2 Day, and the Second Delivery Day.
- d. For FY 2005, please provide the percent of delivery failures to the total volume of Post Office to Addressee Express Mail, as well as the percent of delivery failures separately for Next Day, 2 Day, and the Second Delivery Day.
- e. Please rank order and discuss separately if necessary the three most important factors causing the Postal Service's delivery failures for Post Office to Addressee Express Mail service for Next Day, 2 Day, and the Second Delivery Day.

OCA/USPS-T34-2. This interrogatory seeks information on the Express Mail delivery guarantee. Please refer to your testimony at page 3, lines 6-8. For FY 2005, please provide the total amount of the Postal Service's potential monetary exposure for 1) Post Office to Addressee Express Mail, and 2) separately for Next Day, 2 Day, and the Second Delivery Day, if all customers who experienced delivery failures requested refunds because of the failure to deliver Express Mail by the guaranteed delivery date and time.

OCA/USPS-T34-3. This interrogatory seeks information on the Express Mail delivery guarantee. Please refer to your testimony at page 3, lines 19-20. Also, please refer to DFC/USPS-T34-4(b). For Post Office to Addressee Express Mail, please explain under what circumstances claims for merchandise insurance and document reconstruction insurance against loss, damage, or rifling (up to \$100) are paid in addition to the payment of the guaranteed refund of postage.

OCA/USPS-T34-4. This interrogatory seeks information on the Express Mail delivery guarantee for customers that purchase Post Office to Addressee Express Mail service. Please refer to your testimony at page 4, lines 7-9.

- a. Please confirm that the "receipt" provided to customers showing the guaranteed delivery date and time is a copy of "Mailing Label 11-B." If you do not confirm, please explain.
- b. Other than Mailing Label 11-B, is the guaranteed delivery date and time included elsewhere on the customer's Express Mail item or receipt? For example, is the guaranteed delivery date and time embedded in a barcode, or

printed on some other label placed on the customer's Express Mail item?

Please explain.

- c. Please confirm that a retail window clerk manually writes the guaranteed delivery date and time on Mailing Label 11-B. If you do not confirm, please explain.
- d. Please confirm that the retail window clerk obtains the guaranteed delivery date and time information from the POS terminal. If you do not confirm, please explain.
- e. For Express Mail acceptance at facilities that do not have POS terminals, please explain how acceptance personnel obtain the guaranteed delivery date and time information.
- f. With respect to subparts d. and e, above, is the source of the guaranteed delivery date and time information obtained by the retail window clerk or the acceptance personnel a computer database, system or file, or some other source? Please explain.
- g. With respect to subpart f., above, if the source of the guaranteed delivery date and time information is a computer database, system or file, please identify the name of the computer database, system or file, describe its content and size, explain how it is accessed, and identify those employees in the Postal Service other than retail window clerks and acceptance personnel that have access to the database, system or file.

OCA/USPS-T34-5. This interrogatory seeks information on the Express Mail delivery guarantee for customers that purchase Post Office to Addressee Express Mail service.

Please refer to your testimony at page 4, lines 7-9.

- a. For Post Office to Addressee Express Mail Next Day service scheduled for delivery on Monday through Saturday (assuming no holidays), please confirm that the guaranteed delivery time is either 12:00 Noon or 3:00 PM, depending upon the delivery office. If you do not confirm, please explain. If you do confirm, please explain what factors cause the Postal Service to establish 12:00 Noon or 3:00 PM as the guaranteed delivery time.
- b. For Post Office to Addressee Express Mail Next Day service scheduled for delivery on either a Sunday or holiday, please confirm that the guaranteed delivery time is 3:00 PM. If you do not confirm, please explain. If you do confirm, please explain what factors cause the Postal Service to establish 3:00 PM as the guaranteed delivery time, rather than a 12:00 Noon delivery time option also as exists for scheduled delivery on Monday through Saturday.
- c. For Post Office to Addressee Express Mail 2 Day service scheduled for delivery on Monday through Saturday (assuming no holiday), please provide the guaranteed delivery time.
- d. For Post Office to Addressee Express Mail scheduled for the Second Delivery Day after a Sunday or any holiday, please provide the guaranteed delivery time.

OCA/USPS-T34-6. This interrogatory seeks information on the Express Mail guaranteed delivery date and time for *potential* customers interested in purchasing Post Office to Addressee Express Mail service. Please refer to your testimony at page 4, lines 7-9. For subparts a. – e., below, please provide the following service commitment information for an assumed Express Mail item, entered on the Mailing Date specified—prior to the “Drop-Off” time—for the ZIP Code pairs specified: i.) the scheduled calendar date for delivery (i.e., month/day); ii.) the scheduled delivery time; iii.) the Postal Service’s characterization of the delivery day (i.e., Next Day, 2 Day, the Second Delivery Day); iv.) the number of calendar days to delivery (i.e., 1, 2, 3, or 4 days); and, v.) the Postal Service’s explanation of how to count the number of calendar days to delivery provided in iv.), above.

- a. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 22209.
- b. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 07624.
- c. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 56601.
- d. Mailing Date: Saturday, July 15, 2006. ZIP Code Pair: From 20001 to 97103.
- e. Mailing Date: Saturday, July 1, 2006. ZIP Code Pair: From 20001 to 48154.
- f. Are there any Mailing Dates (within the next 30 days) and ZIP Code pairs for which the Postal Service cannot provide the service commitment information listed in items i.) – v.) above. Please identify or characterize those Mailing

Dates and ZIP Code pairs and explain why the Postal Service cannot provide the service commitment information requested.

- g. Please identify the name of the computer database, system or file, describe its content and size, and explain how it was accessed to provide the service commitment information listed in items i.) – v.), above, for subparts a. – e., above.

OCA/USPS-T34-7. This interrogatory seeks information on the Express Mail guaranteed delivery date and time for *potential* customers interested in purchasing Post Office to Addressee Express Mail service. Assume the same facts as provided in OCA/USPS-T34-6, subparts a. – e., except that the Express Mail item is entered *subsequent* to the “Drop-Off” time on the same Mailing Dates. For the Mailing Dates and ZIP Code pairs in subparts a. – e., below, please provide the following service commitment information: i.) the scheduled calendar date for delivery (i.e., month/day); ii.) the scheduled delivery time; iii.) the Postal Service’s characterization of the delivery day (i.e., Next Day, 2 Day, the Second Delivery Day); iv.) the number of calendar days to delivery (i.e., 1, 2, 3, or 4 days); and, v.) the Postal Service’s explanation of how to count the number of calendar days to delivery provided in iv.), above.

- a. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 22209.
- b. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 07624.
- c. Mailing Date: Tuesday, July 11, 2006. ZIP Code Pair: From 20001 to 56601.

- d. Mailing Date: Saturday, July 15, 2006. ZIP Code Pair: From 20001 to 97103.
- e. Mailing Date: Saturday, July 1, 2006. ZIP Code Pair: From 20001 to 48154.
- f. Are there any Mailing Dates (within the next 30 days) and ZIP Code pairs for which the Postal Service cannot provide the service commitment information listed in items i.) – v.) above. Please identify or characterize those Mailing Dates and ZIP Code pairs and explain why the Postal Service cannot provide the service commitment information requested.
- g. Please identify the name of the computer database, system or file, describe its content and size, and explain how it was accessed to provide the service commitment information listed in items i.) – v.), above, for subparts a. – e., above.

OCA/USPS-T34-8. This interrogatory seeks information on the Express Mail guaranteed delivery date and time for *potential* customers interested in purchasing Post Office to Addressee Express Mail service. Please refer to the following table containing Mailing Dates and ZIP Code pairs:

<u>Mailing Dates</u>	<u>ZIP Code Pairs</u>
Tuesday, July 11, 2006	From 20001 to 22209
Tuesday, July 11, 2006	From 20001 to 07624
Tuesday, July 11, 2006	From 20001 to 56601
Saturday, July 15, 2006	From 20001 to 97103
Saturday, July 1, 2006	From 20001 to 48154

Assume further that a potential retail customer is inquiring about Post Office to Addressee Express Mail service at a retail window for these Mailing Dates and ZIP Code pairs.

- a. Could a retail window clerk with access to a POS terminal provide the scheduled calendar date for delivery (i.e., month/day) and delivery time for the Mailing Dates and ZIP Code pairs in the table above? Please explain. If your answer is in the affirmative, is the retail window clerk's information on the scheduled calendar date for delivery (i.e., month/day) and delivery time obtained from the POS terminal (as opposed to the clerk's general knowledge of Express Mail service, such as knowing that Tuesday delivery in the current week is the same as Tuesday delivery the following week, assuming no holiday)? If your answer is in the affirmative, what is the source of the retail window clerk's information shown on the POS terminal for the scheduled calendar date for delivery (i.e., month/day) and delivery time? Please explain.
- b. For Express Mail acceptance at facilities that do not have POS terminals, please explain how acceptance personnel are able to provide information on the scheduled calendar date for delivery (i.e., month/day) and delivery time for the Mailing Dates and ZIP Code pairs in the table above. What is the source of the acceptance personnel's information on the scheduled calendar date for delivery (i.e., month/day) and delivery time? Please explain.

OCA/USPS-T34-9. This interrogatory seeks information on the Express Mail delivery service performance. Please refer to your testimony at page 4, lines 8-10.

- a. For FY 2005, please provide the volume and percent of Post Office to Addressee Express Mail accepted for Next Day 12:00 Noon delivery, Next Day 3:00 PM delivery, 2 Day delivery, and the Second Delivery Day (show separately for 12:00 Noon and 3:00 PM, if it exists).

- b. For FY 2005, please provide the volume and percent of Express Mail that achieved the service commitment referred to in subpart a., above, for which the Express Mail piece was accepted.