

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
KIRK KANEER TO INTERROGATORIES OF DOUGLAS CARLSON
DFC/USPS-T41-1-6
(June 16, 2006)

The United States Postal Service hereby provides the response of witness Kirk Kaneer to the following interrogatories of Douglas Carlson: DFC/USPS-T41-1-6, filed on June 1, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-1. Please provide a list showing the fee group to which each PO box section nationwide currently is assigned and is proposed to be assigned.

RESPONSE:

The requested information is available in Part C of USPS-LR-L-125, tab WebBATS Data (beginning after the first page exemplar). Column 2 identifies box sections by the ZIP Code in which they exist. Columns 1 and 3 identify the planned and current fee group assignment for each, respectively. Please note that this list may not contain absolutely every ZIP Code containing post office boxes; the absence of counts of boxes in ZIP Codes, for example, can lead to the omission of some ZIP Codes. Resolution of such data anomalies is necessary for implementation of new post office box fees, as has been true in the last several rounds of fee increases. Assuming the Commission recommends the proposed fees and that the Board of Governors orders implementation of those fees, actual implementation will use the best information then available and will require that all data anomalies be fully resolved.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-2. Please refer to your testimony at page 29, lines 16–17. Please confirm that the Postal Service will not permit a customer to choose the post office that will provide him/her Group E service. If you do not confirm, please explain.

RESPONSE:

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-3. Please refer to your testimony at page 29, lines 14–16. Please explain how the Postal Service defines the post office responsible for delivery to a particular location and how a customer can obtain this information.

RESPONSE:

Each potential carrier delivery point (residence or business) lies in the physical delivery area of one ZIP Code and one Post Office. A customer can ask his or her carrier for this information or inquire at a nearby postal facility. As a practical matter, a new resident often learns this information from a neighbor or previous resident. The referenced lines of testimony in this interrogatory, and in DFC/USPS-T41-2, embody no changes to policy or operations.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-4. Please provide the number of postal facilities that offer post-office-box service but that provide neither access to boxes on Saturdays nor delivery to the boxes on Saturday.

RESPONSE:

Determining the number of facilities that offer post-office-box service but that provide neither access to boxes on Saturdays nor delivery to those boxes on Saturdays requires a reliable source of service hours across all facilities matched to the availability of Post Office box service. The data sources relied upon in my testimony are unable to provide the needed information, and no other sources of data have been found that can answer the question posed. The facts that Post Office box fees vary by ZIP Code, and multiple facilities within a ZIP Code may each have unique hours of operation only complicate the situation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-5. Please provide the number of postal facilities that offer post-office-box service but that provide no means by which customers can obtain on Saturdays items that require a signature or than are too large to fit their box.

RESPONSE:

Such data have not been compiled. See the response to DFC/USPS-T41-4.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIRK KANEER
TO INTERROGATORY FROM DOUGLAS CARLSON

DFC/USPS-T41-6. Please confirm that the implementation of DPS for mail destined to post-office boxes has lead [*sic*] to later delivery cutoff times for delivery of this mail to customers' post-office boxes. If you do not confirm, please explain.

RESPONSE:

Not confirmed. DPS has not led to later delivery of mail to post office boxes. What can be said is that DPS mail is typically dispatched on the last morning truck from the processing plant to a local post office, while mail destinating in a box section may or may not go through DPS.

DPS may ultimately speed delivery to post office boxes. Cutoff times are based on a variety of factors, including volume, number of post office boxes, staffing, geography, retail hours, and dispatch schedules for sector/segment and DPS mail. Also, dispatch and delivery to all offices served by a plant must be coordinated together so that mail flows, types of mail worked, and dispatch accommodate the needs of all offices. DPS improves the overall efficiency of mail moving through the system and thus may enable earlier cutoff times and improve customer service.