

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
TO INSTITUTIONAL INTERROGATORIES FROM DAVID POPKIN
DBP/USPS-43-58, 60-85
(June 19, 2006)

The United States Postal Service hereby provides its responses to the following institutional interrogatories from David Popkin: DBP/USPS-43-58 and 60-85, filed on June 5, 2006. On June 15, 2006, the Postal Service filed full objections to DBP/USPS-62, 65, 79-80, and a partial objection to DBP/USPS-85. Various interrogatories in this set, or parts of such interrogatories, can only be answered after a contractor completes its research to develop responses; this fact is noted where appropriate in the responses filed today. The Postal Service accordingly expects that a supplemental set of answers to the interrogatories/parts of interrogatories so identified herein will be filed when that work is complete. Responses thereby supplemented will be identified specifically on the cover sheet when filed. The response to DBP/USPS-59 and its many parts will be forthcoming.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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DBP/USPS-43. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. Please advise what is meant by the term "piece specific data".

RESPONSE:

Data specific to a mail piece.

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DBP/USPS-44. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted. Please confirm, or explain if you are unable to confirm, that EXFC mail pieces are designed so as to be similar in various characteristics to mail pieces that are mailed by the public.

RESPONSE:

Confirmed. Respective test pieces have a variety of piece-specific attributes.

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DBP/USPS-45. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] How many letter size mail pieces were mailed in the EXFC program in a recent year?
- [b] What is the total number of letter size mail pieces that were mailed by the public during the similar year long period?

RESPONSE:

- a. [The requested information is being researched for use in a supplemental response.]
- b. The Postal Service does not count mail pieces mailed by “the public.” However, the billing determinants (USPS-LR-L-77, Table A-1) and RPW (USPS-T-3, Table 1) show that over 43 billion single-piece nonpresorted letters, flats and IPPs/parcels were mailed in FY 2005.

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DBP/USPS-46. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] How many flat size mail pieces were mailed in the EXFC program in a recent year?
- [b] What is the total number of flat size mail pieces that were mailed by the public during the similar year long period?

RESPONSE:

- a. [The requested information is being researched for use in a supplemental response.]
- b. The Postal Service does not count mail pieces mailed by “the public.” However, the billing determinants (USPS-LR-L-77, Table A-1) and RPW (USPS-T-3, Table 1) show that over 43 billion single-piece nonpresorted letters, flats and IPPs/parcels were mailed in FY 2005.

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DBP/USPS-47. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] How many post card mail pieces were mailed in the EXFC program in a recent year?
- [b] What is the total number of post card mail pieces that were mailed by the public during the similar year long period?

RESPONSE:

- a. [The requested information is being researched for use in a supplemental response.]
- b. The Postal Service does not count mail pieces mailed by “the public.” However, the billing determinants (USPS-LR-L-77, Table A-1) and RPW (USPS-T-3, Table 1) show that over 43 billion single-piece nonpresorted letters, flats and IPPs/parcels were mailed in FY 2005.

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DBP/USPS-48. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] Please confirm, or explain if you are unable to confirm, that information was provided in Docket R2005-1 that allowed for the preparation of the following chart:
- [b] Please provide any corrections or updating that is necessary to update this chart.
- [c] Please advise why this information was provided in Docket R2005-1 and yet it was felt to be necessary to redact it in the current Docket.

EXFC EVALUATION BY MAILPIECE CHARACTERISTICS

CODE	TYPE	WIDTH	LENGTH	ADDR	ZIP	CODE	POST	CFM	OVNITE	2DAY	3DAY	
A	C	4	6	PRIN	5	NO	MTR	NO	91.58	85.11	80.31	A
B	C	4	6	HAND	5	NO	STM	NO	89.13	80.86	79.47	B
C	OC	4.75	6.5	HAND	5	NO	STM	NO	95.21	89.77	85.18	C
D	F	9	12	HAND	5	NO	STM	NO	89.38	79.55	70.08	D
E	F	9	12	PRIN	5	NO	MTR	YES	88.78	79.02	69.43	E
F	L	4.125	9.5	PRIN	9	NO	MTR	YES	94.03	89.08	83.20	F
G	L	4.5	10.31	HAND	5	NO	STM	NO	96.32	92.20	86.26	G
H	L	4.125	9.5	HAND	5	NO	STM	NO	96.17	90.99	85.16	H
I	L	3.625	6.5	HAND	5	NO	STM	NO	93.66	88.78	82.71	I
J	L	4.125	9.5	PRIN	5	NO	STM	YES	96.79	92.26	85.71	J
K	L	4.125	9.5	PRIN	9	NO	MTR	YES	95.47	90.71	85.08	K
L	L	4.125	7.25	PRIN	9	NO	MTR	YES	95.26	88.92	82.66	L
M	L	4.125	9.5	PRIN	9	NO	STM	YES	94.61	93.41	85.19	M
N	L	4.125	9.5	PRIN	5	NO	MTR	NO	96.15	91.61	84.85	N
O	L	4.375	7.625	PRIN	9	YES	MTR	YES	95.69	91.00	83.64	O
P	L	3.875	7.5	PRIN	9	YES	MTR	YES	95.55	90.88	83.99	P
Q	L	3.625	6.375	PRIN	9	NO	MTR	YES	94.19	88.98	82.55	Q
R	L	4.125	9.5	PRIN	9	NO	MTR	YES	96.62	92.33	85.57	R
S	L	3.875	8.875	PRIN	9	YES	STM	NO	94.93	93.14	87.13	S

CODE Mailpiece code A through S
TYPE Mailpiece type // C=card OC=Oversize card F=Flat L=Letter
WIDTH Width in inches
LENGTH Length in inches
ADDR PRIN=address is printed HAND=address is handwritten
ZIP Address is shown with either 5- or 9-digit ZIP Code
CODE Mailpiece contains a preprinted 11-digit barcode
POST Method of postage // MTR=postage meter STM=postage stamp
CFM Mailpiece contains a CONFIRM barcode
OVNITE Percent on-time for Overnight Mail for PQ 2 FY 2005
2DAY Percent on-time for 2-Day Mail for PQ 2 FY 2005
3DAY Percent on-time for 3-Day Mail for PQ 2 FY 2005
 No mailpiece utilizes additional services such as Certified Mail, Registered Mail, COD, or Insured Mail.
 All mailpieces are either one ounce or two ounces [other than cards].

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RESPONSE:

- a. Confirmed.
- b. [The requested information is being researched for use in a supplemental response.]
- c. The Postal Service still considers mail piece information for EXFC test pieces sensitive information that should be kept out of the public domain.

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DBP/USPS-49. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix II has been completely redacted except for the title, "Description of First-Class Mail Piece Types [EXVC]".
- [b] Please advise what EXVC stands for.
- [c] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix II contains a listing of the categories [such as length, width, printed or handwritten address, color of mail piece, whether preprinted ZIP Code, Confirm code, etc] that data is provided for to describe [sic] the various mail pieces.
- [d] Please explain how knowledge of the categories that are referred to in subpart b [as opposed to knowledge of the data for a specific mail piece such as a length of 9 inches] might help an individual identify test pieces.

RESPONSE:

- a. Not confirmed. See USPS-LR-L-134, "page 6", for the exact language provided.
- b. EXFC.
- c. Substantially confirmed (assuming the mangled syntax has been parsed accurately). Appendix II does not identify ZIP Codes as "preprinted" or otherwise; also "Confirm code" information is reflected only as a percentage of pieces using a footnote.
- d. Part (b) of this interrogatory does not address "categories". Notwithstanding, any information that might help an employee to identify test pieces increases the potential for bias in EXFC results. Appendix II does specify mailpiece sizes, hence it was originally redacted. See also, the Response to DBP/USPS-50.

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DBP/USPS-50. Please provide an unredacted version of USPS-LR-L-134 Appendix II.

RESPONSE:

Copy attached.

DESCRIPTION OF FIRST-CLASS MAIL® PIECE TYPES

MAIL TYPE*	INDICIA*	ENVELOPE TYPE*	PRINT TYPE	% OF TOTAL	SIZE	ZIP CODE LENGTH	RETURN ADDRESS	(oz) WEIGHT	COLOR
Card/Letter	Stamp	Closed Face	Hand	5.5	4 7/8 x 6 1/2	5	Hand	1	White
Letter	Stamp	Closed Face	Hand	2.4	4 1/2 x 10 5/16	5	Hand on Back	1.5	White
Letter	Stamp	Closed Face	Hand	10.0	4 1/8 x 9 1/2	5	Label	1	White
Letter	Stamp	Closed Face	Hand	4.0	3 5/8 x 6 1/2	5	Hand	1	Green
Letter	Stamp	Closed Face	Inkjet	8.2	4 1/8 x 9 1/2	5	Label	1	White
Flat	Stamp	Closed Face	Hand	3.2	9 x 12	5	Label	2	White
Post Card	Stamp	N/A	Hand	0.5	4 x 6	5	None	1	White
Letter	Meter	Cello Window	Laser	6.0	4 1/8 x 9 1/2	9	Cellophane Laser	1	White
Letter	Meter	Cello Window	Laser	9.7	4 1/8 x 9 1/2	9	Preprinted	1	White
Letter	Meter	Open Window	Laser	4.2	4 1/8 x 7 1/4	9	None	1.5	White
Letter	Meter	Cello Window	Laser	9.7	3 5/8 x 6 3/8	9	Preprinted	1	Gray
Letter	Stamp	Open Window	Laser	4.7	4 1/8 x 9 1/2	9	None	1	Gray
Letter	Meter	Cello Window	Laser	0.6	4 1/2 x 9 1/2	9	Preprinted	1.5	White
Letter	Meter	Closed Face	Laser on Label	4.9	4 1/8 x 9 1/2	5	Label	1	White
Flat	Meter	Cello Window	Laser	2.8	9 x 12	5	Label	2	White
Post Card	Meter	N/A	Inkjet	2.8	4 x 6	5	None	1	White
Letter	Stamp	Closed Face	Inkjet	1.0	3 7/8 x 8 7/8	9**	None	1	Buff
Letter	Meter	Cello Window	Laser w/barcode above	10.0	3 7/8 x 7 1/2	9	Preprinted	1	White
Letter	Meter	Cello Window	Laser w/barcode below	9.8	4 3/8 x 7 5/8	9	Preprinted	1	White

* Planet Codes will be applied to 5% of the test mailpieces for at least three different mail type/indicia/envelope type combinations.

** Pre-barcode: A Facing Identification Mark, (FIM) A, as outlined in DMM Section C.100.5.2a, must be applied.

DESCRIPTION OF PRIORITY MAIL PACKAGES

PACKAGE TYPE	% OF INDICIA	TOTAL	PRINT TYPE	SIZE	DELIVERY ADDRESS POSITION	RETURN ADDRESS POSITION	ZIP CODE LENGTH	(oz) WEIGHT	SOURCE
Tyvek	Meter	13.76	Laser	15 1/2" x 12"	left justified	center**	9	11	USPS
Flat	Meter	28.72	Laser	12 1/2" x 9 1/2"	left justified	left justified	9	8	USPS
Flat	Stamp	4.20	Laser	12 1/2" x 9 1/2"	left justified in center	left justified	9	8	USPS
Small Flat	Meter	5.76	Laser	10" x 6"	left justified preceded by "To"	left justified preceded by "From"	5	4	USPS
Small Flat	Stamp	0.80	Laser	10" x 6"	left justified preceded by "To"	left justified preceded by "From"	5		USPS
Small Parcel	Meter	5.76	Laser	10" x 5 3/4" x 1 1/2"	left justified	center**	9	12	supplie
Small Parcel	Stamp	0.80	Laser	10" x 5 3/4" x 1 1/2"	left justified	center**	9	12	supplie
Variable Flat*	Meter	8.00	Hand***	12" x 9"	center	upper left corner	5	5	supplie
Variable Flat*	Stamp	0.80	Hand***	12" x 9"	center	upper left corner	5	5	supplie
Bubble Padded	Meter	8.00	Laser	6 7/8" x 9 3/8"	left justified	center	9	4	supplie
Tyvek	Stamp	3.40	Hand***	12" x 9"	center preceded by "To"	left justified preceded by "From"	5	7	supplie

* Rotate colors between current color, gray/off white, & cardboard/paper bag colors.
 ** Clip art with the return address.
 *** Postal supplied Priority Mail labels must be used.

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DBP/USPS-51. Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

- [a] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix IX has been completely redacted except for the title, "Distribution of Priority Mail Packages [PETE]".
- [b] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix IX contains a listing of the categories [such as length, width, printed or handwritten address, color of mail piece, whether preprinted ZIP Code, Confirm code, etc] that data is provided for to describe [sic] the various mail pieces.
- [c] Please explain how knowledge of the categories that are referred to in subpart b [as opposed to knowledge of the data for a specific mail piece such as a length of 9 inches] might help an individual identify test pieces.
- [d] Please provide an unredacted copy of Appendix IX.

RESPONSE:

- a. Not confirmed. See USPS-LR-L134, "page 21", for the exact language provided.
- b. Substantially confirmed (assuming the mangled syntax has been parsed accurately). Appendix IX does not identify ZIP Codes as "preprinted" or otherwise; nor does it address the presence of "Confirm code" in any way.
- c. Any information that might help an employee to identify test pieces increases the potential for bias in EXFC results. Appendix IX does contain mail piece size information.
- d. Copy attached.

DESCRIPTION OF PRIORITY MAIL PACKAGES

APPENDIX IX

PACKAGE TYPE	INDICIA	% OF TOTAL	PRINT TYPE	SIZE	DELIVERY ADDRESS POSITION	RETURN ADDRESS POSITION	ZIP CODE LENGTH	(oz) WEIGHT	SOURCE
Tyvek	No # postage	3.94	Laser	15½" x 12"	left justified	center**	9	12	ISPS
Flat	No # postage	8.50	Laser	12½" x 9½"	left justified	left justified	9	8	ISPS
Small Flat	No # postage	1.44	Laser	10" x 6"	left justified preceded by "To"	left justified preceded by "From"	5	4	ISPS
Small Parcel	No # postage	1.44	Laser	10" x 5¾" x 1½"	left justified	center**	9	12	supplier
Variable Flat*	No # postage	2.00	Hand***	12" x 9"	center	upper left corner	5	5	supplier
Bubble Padded	No # postage	2.00	Laser	67/8" x 93/8"	left justified	center	9	4	supplier
Tyvek	No # postage	0.68	Hand***	12" x 9"	center preceded by "To"	left justified preceded by "From"	5	7	supplier

* Rotate colors between current color, gray/off white, & cardboard/paper bag colors.

** Clip art with the return address.

*** Postal supplied Priority Mail labels must be used.

These test mail pieces are inducted over-the-counter at post offices. The 100 Delivery Confirmation test mail pieces, per Performance Cluster, must only be distributed among all of these mail piece descriptions.

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DBP/USPS-52. Please advise the total number of reporters utilized in the First-Class Mail EXFC program.

RESPONSE:

[It is presumed, despite this question's ungrammatical use of a transitive verb as if it were intransitive, that the number of EXFC reporters is of interest. The requested information is being researched for use in a supplemental response.]

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DBP/USPS-53. Please advise the total number of reporters utilized in the Priority Mail PETE program.

RESPONSE:

[The requested information is being researched for use in a supplemental response.]

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DBP/USPS-54.

- [a] Please advise if EXFC and PETE measures performance in every District/Performance Cluster.
- [b] If not, please advise the District/Performance Cluster that is not measured [separate listing for EXFC and PETE] , the associated 3-digit ZIP Codes, and the reasons for not including that area.

RESPONSE:

- a-b. EXFC measures performance in every District/Performance Cluster. PETE has been retired.

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DBP/USPS-55.

- [a] Please provide a listing by Area showing the District/Performance Cluster and the 3-digit ZIP Codes [it is not necessary to list ZIP Codes that are not associated with a collection box such as 005, 055, and 102 - however 202-205 should be included] that are not included in the EXFC and PETE programs [separate listing for EXFC and PETE].
- [b] Please advise why each of these 3-digit ZIP Codes is not included in the EXFC and PETE program.
- [c] Is the listing of 3-digit ZIP Code destination points of test mail the same as the entry points of test mail?
- [d] If not, please enumerate and explain.

RESPONSE:

a-b. A list of EXFC ZIP Codes is attached. These can be compared with each performance cluster's list of the three-digit ZIP Codes in Appendix I ("page 3) of USPS-LR-L-134. PETE has been retired. Any exclusions would be due, as reflected in language posted with EXFC scores, to the facts that:

EXFC continuously tests a panel of 463 ZIP Code areas selected on the basis of geographic and volume density from which 90% of First-Class volume originates and 80% destines. EXFC is not a system-wide measurement of all First-Class Mail performance.

- c. Yes.
- d. N.A.

Area	Performance Cluster	EXFC ZIP Codes											
Capital Metro	Baltimore	210	211	212	214	217	219						
	Capital	200	206	207	208	209							
	Northern Virginia	201	220	221	222	223							
	Richmond	224	225	230	231	232	233	234	235	238			
Eastern	Appalachian	240	250	251	252	253	263	264	265				
	Central Pennsylvania	170	171	172	176	178	185	187	196				
	Cincinnati	410	436	450	451	452	454	458	470				
	Columbus	430	431	432	433								
	Erie	159	161	164	165	166							
	Greater South Carolina	290	291	292	293	294	295	296					
	Greensboro	270	271	272	273	274	275	276	277	278	286		
	Kentuckiana	400	401	402	405	406	471	477					
	Mid-Carolinas	280	281	282	283	288	297						
	Northern Ohio	440	441	442	443	445	447	449					
	Philadelphia Metro	180	189	190	191	193	194						
	Pittsburgh	150	151	152	153	154	156						
South Jersey	080	081	082	083	084	197	198						
Great Lakes	Central Illinois	604	605	616	617	618	627						
	Chicago	606	607										
	Detroit	481	482	492									
	Gateway	620	622	630	631	633	652						
	Greater Indiana	460	461	462	463	464	466	468	469	473	478	479	
	Greater Michigan	486	488	489	490	493	494	495					
	Lakeland	530	531	532	535	537	543	544	549				
	Northern Illinois	600	601	602	603	611							
	Royal Oak	480	483	484	485								
New York Metro	Caribbean	009											
	Central New Jersey	077	085	086	088	089							
	Long Island	115	117	118	119								
	New York	100	104										
	Northern New Jersey	070	071	072	073	074	075	076	078	079			
	Triboro	110	112	113	114	116							
Northeast	Westchester	105	106	107	108	109	125						
	Albany	120	121	122	123	128	130	131	132	135	139		
	Boston	021	024										
	Connecticut	060	061	062	064	069							
	Maine	040	041	043	044	045	048						
	Massachusetts	010	011	012	013	015	016	017	018	019			
	New Hampshire/Vermont	030	031	032	033	034	038	050	054				
	Southeast New England	020	023	027	028	029							
Western New York	140	141	142	143	144	145	146						
Pacific	Arizona	850	852	853	855	856	857						
	Bay-Valley	939	945	946	947	948	950	951					
	Honolulu	967	968										
	Los Angeles	900	902	903	904	905							
	Nevada-Sierra	890	891	895									
	Sacramento	937	952	956	957	958							
	San Diego	919	920	921	924								
	San Francisco	940	941	943	944	949							
	Santa Ana	906	907	908	917	918	926	927	928				
	Van Nuys	911	913	914	915	916	930	931	933				
	Southeast	Alabama	350	351	352	358	361	366					
Atlanta		300	301	302	303								
Central Florida		327	328	329	334								
Mississippi		386	390	391	392	395							
North Florida		320	321	322	323	325	326						
South Florida		330	331	332	333								
South Georgia		309	310	312	314	319							
Suncoast		335	336	337	338	339	341	342	346				
Tennessee		370	371	372	374	379	380	381					
Southwest	Albuquerque	870	871										
	Arkansas	720	721	722	723	727							
	Dallas	750	751	752	754	757							
	Fort Worth	760	761	762	764	791	794						
	Houston	770	772	773	774								
	Louisiana	700	701	705	708	711							
	Oklahoma	730	731	740	741	743							
	Rio Grande	765	767	780	781	782	784	786	787	788	789	797	799
Western	Alaska	995	996										
	Big Sky	590	591	598									
	Central Plains	515	516	666	670	671	672	680	681	685			
	Colorado/Wyoming	800	801	802	803	809	820						
	Dakotas	570	571	573	581								
	Hawkeye	500	501	502	503	507	511	520	524	612			
	Mid-America	640	641	658	661	662							
	Northland	540	546	550	551	553	554	559	563				
	Portland	970	971	972	973	974	986						
	Salt Lake City	840	841	844									
	Seattle	980	981	982	984	985							
	Spokane	835	837	838	990	991	992	994					

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DBP/USPS-56.

- [a] Please refer to USPS-LR-L-134 Appendix I and explain why 078 and 079 are shown in the Central New Jersey District when they are now in the Northern New Jersey District?
- [b] Please advise if there are any other changes necessary to this listing to account for changes in District responsibilities.

RESPONSE:

- a-b. The information was accurate at the time it was compiled. No need to update the information has been identified.

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DBP/USPS-57. Please list and discuss the advantages and disadvantages the exist in a ZIP Code area that is included in the EXFC program as opposed to a ZIP Code area that is not included in the EXFC program.

RESPONSE:

No analysis of respective advantages and disadvantages has been performed. The ZIP Code areas included reflect a cost based approach to survey research.

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DBP/USPS-58. Please discuss why EXFC mail must be compatible with USPS automation and mechanization equipment.

RESPONSE:

Because otherwise it would not constitute a test of a mail processing network that is automated and mechanized.

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DBP/USPS-60. The last sentence of Section A.6.4 of USPS-LR-L-134 states that mail pieces indicted in the Caribbean must show a Caribbean return address.

- [a] Please explain the reason for this.
- [b] Does a similar requirement exist for any other area?
- [c] If not, why not?

RESPONSE:

- a. Return addresses should reflect where the mail piece enters the mail stream, thereby mimicking normal mail piece patterns.
- b. Yes.

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INTERROGATORY FROM DAVID B. POPKIN

DBP/USPS-61. Please explain why the same individual can not be both an EXFC dropper and reporter.

RESPONSE:

These roles are separated to maintain the integrity of the system by eliminating the possibility of an individual inducting mail for which she may be a recipient. Elimination of this constraint would also eliminate the inherent cross check between dropper and reporter information.

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

DBP/USPS-62. Please provide a copy of the EXFC dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

RESPONSE:

Objection filed.

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

DBP/USPS-63. Please describe the procedures that are utilized to ensure that the data provided by EXFC droppers is accurate.

RESPONSE:

Please see the response to DBP/USPS-115/R2005-1.

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

DBP/USPS-64. Please refer to the word "prior" appearing as the third word from the end of the 4th line in the first paragraph of Section B.3 of USPS-LR-L-134 and also appearing as the 11th word on the 3rd line of Section D.1.2.

[a] Should this word be changed to "subsequent"?

[b] If not, please provide a discussion of the scenario presented in the 2nd and 3rd sentence of this first paragraph of B.3 and D.1.2 utilizing specific times and days of the week to explain the purpose of these two sentences.

RESPONSE:

- a. No.
- b. IBM retrieves information from the CPMS database. It is used for both planning and validation. Bundles are mailed to the droppers based on then current CPMS information. If there is a change in the pick up schedule in the interval between the preparation of bundles and the actual drop, the dropper will not be aware of it. If a dropper inducts a stamped bundle in a mailbox expecting to do so before the Last Pickup time (LPU) finds – on arriving at the box – that the LPU is earlier than expected, they mail can still be inducted, but the date of induction will be rolled forward one day. Example: the dropper arrives at a mailbox at 2:15 p.m., and finds the mailbox is actually marked for a last collection at 1:00 p.m. The dropper inducts the mail anyway, then informs IBM that the mail is expected to be picked up the next day, since the drop was after the LPU. IBM dates and reports that bundle as inducted the next day.

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

DBP/USPS-65. Please provide a copy of the EXFC reporter instructions referred to in the last sentence of Section C.2 of USPS-LR-L-134.

RESPONSE:

Objection filed.

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

DBP/USPS-66.

- [a] Please describe the procedures that are utilized to ensure that the data provided by EXFC reporters is accurate.
- [b] Please describe the procedures of how the USPS will independently conduct tests of reporter accuracy as described in Section D.9 of USPS-LR-L-134.

RESPONSE:

Please see the response to DBP/USPS-116/R2005-1.

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

DBP/USPS-67. Please advise why the data shown in Section D.1.3 of USPS-LR-L-134 adds up to a total of 99% rather the 100%.

RESPONSE:

Rounding error.

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

DBP/USPS-68. With respect to the discussion number of days to deliver as shown in Section D.3 of USPS-LR-L-134, please confirm, or explain if you are unable to confirm, the following:

- [a] A letter mailed from New Jersey on Saturday May 27, 2006, to California [normally having a 3-day service standard] and delivered on Tuesday, May 30, 2006 [Monday May 29 was a holiday] will be considered to have been delivered in one day even though it took three calendar days.
- [b] Please provide a breakdown for a recent one year period of the percentage of 3-day service standard mail that is delivered in 1-day, 2-days, 3-days, 4-days, and 5+ days utilizing the method of counting days as described in Section D.3.
- [c] Please provide a breakdown for a recent one year period of the percentage of 3-day service standard mail that is delivered in 1-calendar day, 2-calendar days, 3-calendar days, 4-calendar days, and 5+ calendar days.
- [d] Please provide a breakdown for a recent one year period of the percentage of 2-day service standard mail that is delivered in 1-day, 2-days, 3-days, 4-days, and 5+ days utilizing the method of counting days as described in Section D.3.
- [e] Please provide a breakdown for a recent one year period of the percentage of 2-day service standard mail that is delivered in 1-calendar day, 2-calendar days, 3-calendar days, 4-calendar days, and 5+ calendar days.

RESPONSE:

[The requested information is being researched for use in a supplemental response.]

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INSTITUTIONAL
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DBP/USPS-69. With respect to the discussion number of days to deliver as shown in Section D.3 of USPS-LR-L-134, confirm, or explain if you are unable to confirm, that another possible way of counting the number of days to deliver could be to not eliminate non-delivery days if it would result in a delivery time of less than the delivery service standard. For example, overnight and 2-day service standard letters mailed on a Saturday and delivered on the following Monday would be counted as 1-day for the overnight letter and 2-days for the 2-day letter. Another example would be overnight, 2-day, and 3-day letters mailed on a Saturday prior to a Monday holiday and all three are delivered on Tuesday would be counted as 1-day for the overnight letter, 2-days for the 2-day letter, and 3-days for the 3-day letter.

RESPONSE:

While the Postal Service has not explored these postulated options, it is probably safe to confirm that they may be possible.

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INTERROGATORY FROM DAVID B. POPKIN

DBP/USPS-70.

- [a] Please confirm, or explain if you are unable to confirm, that more than 50% of the 2-day service standard mail is delivered in 2-calendar days if a non-delivery day is not involved.
- [b] Please confirm, or explain if you are unable to confirm, that more than 50% of the 3-day service standard mail is delivered in 3-calendar days if a non-delivery day is not involved.
- [c] Please provide the actual percentages for a recent period.

RESPONSE:

The Postal Service, having not explored evaluating service performance as postulated by this interrogatory, is unable to confirm.

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

DBP/USPS-71.

- [a] Please confirm, or explain if you are unable to confirm, that both the method of counting days provided in Section D.3 of USPS-LR-L-134 and the possible method described in Interrogatory DBP/USPS-69 will introduce a certain amount of inaccuracy due to the effect of non-delivery days.
- [b] Please confirm, or explain if you are unable to confirm, that the method of counting days provided in Section D.3 of USPS-LR-L-134 will introduce a greater amount of inaccuracy due to the effect of non-delivery days when compared to the possible method described in Interrogatory DBP/USPS-69 based on the response to Interrogatory DBP/USPS-70.

RESPONSE:

The Postal Service, having not explored evaluating service performance as postulated by this interrogatory, is unable to confirm.

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

DBP/USPS-72. Please explain why the EXFC program utilizes the method of counting days provided in Section D.3 of USPS-LR-L-134 as opposed to the possible method described in Interrogatory DBP/USPS-69

RESPONSE:

The Postal Service has not explored Mr. Popkin's postulated alternative ways of evaluating service performance; nor does it perceive any need to do so.

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

DBP/USPS-73. Please explain the method used to count the number of days to deliver in any other program [such as ODIS] that evaluates the number of days to deliver.

RESPONSE:

Please see the attached pages from Publication 195; the Glossary defines "Service Time," while section 281.3 explains the "Number of days to delivery."



ODIS: **Origin-Destination Information System**

Publication 195, April 1991

Mail Mix - A variety or combination of mail classes and physical shapes usually found in any delivery unit. An example of mail mix is the combination of First-Class/third-class letters, First-Class/third-class flats, fourth-class parcels, etc., in a single delivery unit.

Management Sectional Center (MSC) - A postal facility reporting to a field division and headed by a manager with full management (administrative) responsibility for all post offices within his other assigned ZIP Code areas.

Multi-Stage Sampling - A sampling initially among larger segments, then from elements within the selected larger segments, and so on for the appropriate number of stages. ODIS uses two-stage sampling: first sampling among groups of delivery units within an ODIS area and second, sampling from pieces of mail at the selected delivery unit.

Multi-ZIP Coded City - A post office having more than one 5-digit ZIP Code within its delivery area.

ODIS Area - An SCF area, an associate office area of an SCF, a multi-ZIP Coded city, an independent city post office, or a postal concentration center. All 28,850 post offices and their subordinate facilities are grouped into approximately 724 ODIS areas.

Postal Concentration Center (PCC) - A facility operated by the Postal Service for distribution of Army/Air Force Post Office and Fleet Post Office (APO and FPO) mail entering and exiting the domestic mail system.

Regular Sample - A sample of First-Class Mail, third-class mail, and all foreign mail making up each ODIS test. (See also, Heavy Sample.)

Sample Selection Printout - A list of post office delivery units selected for ODIS testing each quarter. The list contains the name of the delivery unit and the date on which each unit should be tested.

Sectional Center Facility (SCF) - A post office assigned to serve as the principal mail processing facility for one or more post offices. Some 470 post offices serve as SCFs, receiving and dispatching mail moving between post offices within other areas, as well as receiving and dispatching mail moving into or out of other areas. Post offices within the area served by the SCF are termed associate offices. An SCF post office and its associate offices make up an SCF area. (See also, ODIS Area.)

Service Time - The number of calendar days that elapse between the cancellation date (or meter date) on a piece of mail and the date that mail is tested (day of intended delivery). Service time is adjusted for Sundays and holidays (nondelivery days) in the following manner: If the mail is (a) tested (i.e., delivered) on a Monday or the day after a holiday, and (b) the postmark date is not a Sunday or holiday, then the service time is reduced by the number of nondelivery days since the last possible delivery day. This is generally 1 day. Thus, service time for mail postmarked Friday and delivered Monday would be 2 days to delivery. If this mail were delivered on Tuesday, however, service time would be 4 days to delivery. Service time for mail postmarked Sunday and delivered Monday would be 1 day to delivery.

Skip Interval - A number (or its multiple) of the pieces of mail to be sampled after the first piece has been sampled. For example, a skip interval of 5 signifies every fifth piece is sampled; a skip interval of 1, every piece is sampled.

Starting Number - The number of the first piece of mail to be selected and sampled.

280 Data aggregation

281 Data processing

281.1 Electronic transmission. After the on-site completion of an ODIS test, the data are immediately uploaded by telephone from the laptop computer to the Base Unit at the MSC, or by an immediate disk-transfer to the Base Unit upon the return of the data collector to the MSC. ODIS data, collected daily, are stored in the MSC Base Unit until the end of each week. At the end of each week (usually on Friday evenings), all data are uploaded from these base units to the mainframe at the National Information Systems Support Center (NISSC) in Raleigh, NC, for consolidation and processing.

281.2 Record components. The test identification number, the date of the test, and the skip interval become part of each record when ODIS test data are uploaded to the Base Unit. The date of the test and the postmark date are converted to Julian dates (e.g., January 1 is 001, February 1 is 032, etc.), and codes are assigned to other items such as postmark of origin, mail class, mail type, indicia, ZIP Code, barcode, and mailer's ID.

281.3 Number of days to delivery. The number of days to delivery is determined by subtracting the postmark date from the test date (delivery date). The result, carried as part of the record, is adjusted for nondelivery days during report processing. (Refer to service time in Appendix A - Glossary.)

281.4 Inflation process

281.41 Pre-report processing routine. The major pre-report processing routine is the inflation process. This routine determines the weight value for each piece of mail sampled and, therefore recorded. Since only a fraction of the mail is sampled, it is necessary to weight each piece sampled in terms of the amount of mail it represents.

281.42 Weighting. Weighting is based on the known probability of selection of each piece of mail in the two-stage sampling process. The weight of the delivery unit (WDU) is calculated at USPS Headquarters by dividing the total number of delivery units in a given sample group by the number of tests received for that sample group in that ODIS area. See Exhibit 281.41 for an example that illustrates the inflation process. The two stages or factors of sampling are:

- a. number of delivery units represented by the delivery unit tested (referred to as WDU); and
- b. skip interval used.

281.43 Example. In Atlanta, GA (ASOC PO), ODIS area 300, mail for a small firm has been recorded on an ODIS test. In this postal quarter, 48 small firms in the Atlanta associate offices were sampled out of a possible 1,792 such units. Thus, the WDU for one of these units which has a test is $37.333 (1792/48)$. If the skip interval used were 5, then one piece of mail would represent 37.333×5 or 186.665 pieces. In other words, this one piece represents five pieces of mail in the delivery unit and the delivery unit represents 37.333 delivery units in the ODIS area. Therefore, the piece recorded represents 186.665 pieces in the ODIS area. When the weights for all sample pieces in an ODIS area have been determined, they may be totaled to give the estimate of the average daily volume of mail delivered each day in that ODIS area.

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DBP/USPS-74.

- [a] Should the words "one day" appearing on the 4th line of the 4th paragraph of Section D.3 of USPS-LR-L-134 be changed to read "two days"?
- [b] If not, please explain.

RESPONSE:

- a. No.
- b. No need for such a change has been identified.

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

DBP/USPS-75. Please provide the EXFC data for the past year or more in the format shown in Sections E.1.1 and E.1.2 of USPS-LR-L-134.

RESPONSE:

See the attachment to this response.

EXFC Mail Measurement System

FC: On-Time Performance for Origin/Destination Mailpieces

	FY2005	FY2005	FY2005	FY2005	FY2006	FY2006
	Quarter I	Quarter II	Quarter III	Quarter IV	Quarter I	Quarter II
OD Overnight	95	95	96	95	94	95
OD TWO DAY	90	90	92	91	88	89
OD THREE DAY	86	83	90	90	83	86

EXFC is an external measurement system of collection box to mailbox delivery performance. EXFC continuously tests a panel of 463 ZIP Code areas selected on the basis of geography and volume density from which 90% of First-Class volume originates and 80% destinate. EXFC is not a system-wide measurement of all First-Class Mail performance.

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DBP/USPS-76. Please refer to Section E.4.3 of USPS-LR-L-134. Please discuss the extent to which the CPMS data is available to the EXFC personnel including, but not limited to, the method of access [hard copy, electronic copy, online access, etc.] the data fields that are contained in the records, whether it provides all collections at a given collection box or only the last collection time of the day, and the frequency that the data is updated.

RESPONSE:

CPMS data are available to all EXFC personnel via the Postal Service intranet. CPMS contains the location of collection boxes, pick up times, and collection box identification information.

Data are updated when changes are made to collection schedules.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INSTITUTIONAL
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DBP/USPS-77. Please refer to Section F.1 of USPS-LR-L-134.

- [a] With respect to the EXFC/PETE/Express Mail testing program, please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have knowledge of or access to of the identity of droppers/reporters or the proposed location for dropping or receiving mail [prior to the delivery of the mailpiece]?
- [b] Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information.
- [c] Please provide any studies by GAO/OIG/Inspection Service or any other group that evaluates the claimed disclosure of this information or the security to prevent disclosure that have been made in the past 6 years.

RESPONSE:

- a. No USPS employees have knowledge of or access to the identities of droppers or reporters. The TTMS team, consisting of three employees, has knowledge of forecasted drop locations prior to the delivery of the mail.
- b. The three employees referenced in response to part (a) do not share their information with other postal employees. Moreover, Information received from the contractor is protected via password.
- c. No such studies exist.

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

DBP/USPS-78. Please refer to Section F.2 of USPS-LR-L-134. Please provide a copy of the latest evaluation of the EXFC program.

RESPONSE:

There is no written evaluation of the EXFC program. The contractor's performance is monitored by reviewing periodic reports and holding weekly teleconferences. Each quarter, face to face strategy meetings involving contractor personnel and Postal Service representatives are held to discuss all issues and concerns that arise.

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

DBP/USPS-79. Please provide a copy of the PETE dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

RESPONSE:

Objection filed.

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

DBP/USPS-80. Please provide a copy of the PETE reporter instructions referred to in the last sentence of the first paragraph of Section C.2 of USPS-LR-L-134.

RESPONSE:

Objection filed.

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

DBP/USPS-81.

- [a] May the same individual participate in both the EXFC and PETE programs as either a dropper or reporter?
- [b] If not, why not?

RESPONSE:

a-b. Yes.

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

DBP/USPS-82. Please provide copies of the latest one year or more report of the Priority Mail performance data.

RESPONSE:

The table below shows FY 2005 Priority Mail performance data:

	<u>FY 2005 (percent)</u>	
	Overnight	2 Day
Q1	90.20	81.46
Q2	90.51	87.07
Q3	91.38	87.11
Q4	92.49	90.57

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

DBP/USPS-83.

- [a] What percentage of the EXFC mail pieces that are reported as having been mailed are never reported as having been received?
- [b] What percentage of the PETE mail pieces that are reported as having been mailed are never reported as having been received?
- [c] Please advise how a mail piece which is reported as having been mailed but is never reported as being received is counted in the EXFC and PETE programs.

RESPONSE:

[The requested EXFC information is being researched for use in a supplemental response.

PETE no longer exists.]

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

DBP/USPS-84. Please advise the specific pages of the appendices that contain redacted material and the nature of the material that has been redacted.

RESPONSE:

In Appendix X, the formulas and paragraphs describing each formula were redacted. In Appendix XI, ZIP Codes used for entry of PETE pieces were redacted since they have not previously been released. In Appendix XIII, piece-specific information used illustratively in various columns are blanked out; column headers are still visible. Some additional information was provided with library reference USPS-LR-L-134 when it was filed.

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

DBP/USPS-85. Please advise the compensation, if any, that is provided to droppers, reporters, and return address panel members in both the EXFC and PETE programs.

RESPONSE:

A partial objection to this interrogatory has been filed. Those who provide these professional services are compensated for their time.