

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
SUSAN W. BERKELEY (USPS-T-34) TO INTERROGATORIES
OF DOUGLAS F. CARLSON (DFC/USPS-T34-5-6)
(June 21, 2006)

The United States Postal Service hereby provides the responses of
witness Susan W. Berkeley (USPS-T-34) to interrogatories DFC/USPS-T34-5-6,
filed on June 7, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T34-5. Please confirm that post offices typically post a collection time at Express Mail collection boxes that is the same time as the earliest Express Mail cutoff time at the retail window of a station under the jurisdiction of that post office. For example, if the earliest Express Mail cutoff time at a station is 4 PM, the Express Mail collection boxes should show a collection time at 4 PM. If you do not confirm, please explain.

RESPONSE:

It is my understanding that collection schedules are set so as to provide the latest possible collection consistent with local acceptance and dispatch capabilities.

The collection time posted on a collection box does not necessarily correspond with the cutoff time at the retail window at the post office, as time has to be allotted for transporting the Express Mail piece to the post office.

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T34-6. Please describe the computer system that post offices use to determine Express Mail delivery guarantees for items that are deposited in Express Mail collection boxes before the posted collection time but that do not arrive at an Express Mail acceptance office until after the collection time. (In your response, please explain how the Postal Service obtains delivery guarantees that apply to items deposited before the cutoff time when the acceptance transaction is occurring after the cutoff time.)

RESPONSE:

The delivery commitment for a particular Express Mail article is determined by reference to the Express Mail directories. These directories are either downloaded into Point of Service ONE (POS ONE), loaded from a diskette into the integrated retail terminals (IRTs), or referenced from a hardcopy format at the associate office, station, or branch. It is my understanding that both POS ONE and IRTs allow the employee recording acceptance of an Express Mail article to enter the collection box pick-up time as the official time of acceptance in lieu of the actual system time on the computer.