

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE (OCA/USPS-T34-1(e), 6(a)-(e), AND 7(a)-(e))
(June 26, 2006)

The United States Postal Service hereby objects to interrogatories OCA/USPS-T34-1, part (e), OCA/USPS-T34-6, parts (a) through (e), and OCA/USPS-T34-7, parts (a) through (e). The interrogatories are considered in turn:

OCA/USPS-T34-1(e)

This interrogatory, in its entirety, reads as follows:

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.

With respect to part (e) of this interrogatory, the OCA asked an essentially identical question in Docket No. R2005-1. See Docket No. R2005-1, Tr. 8D/4769 (response of the Postal Service to OCA/USPS-64). The Postal Service responded by stating that it “does not maintain information regarding the cause of particular Express Mail delivery failures.” See id. In its answer to a follow-up interrogatory, the Postal Service elaborated on that response by stating: “Service performance diagnostics and as well as remedial action for identified problems are entrusted to Postal Service field personnel who are in the best position to identify and correct deficiencies. To the extent they are unable to remedy any problems, they request network changes through Headquarters.” See id. at 4902 (response of the Postal Service to OCA/USPS-135).

The Postal Service will file a response to part (e) of this interrogatory providing the same information that it provided in Docket No. R2005-1. To the extent that the OCA does not consider such a response to be sufficient, however, the Postal Service objects to part (e) on the grounds of burden and relevance. As the Postal Service noted in Docket No. R2005-1, and will note in the upcoming response to this interrogatory, field personnel are entrusted with identifying Express Mail problems and attempting remedial action, since those personnel are in the best position to identify and correct deficiencies; to the extent the field is unable to correct a service issue, they request a network change through Headquarters. Any analyses conducted by managers in the field to isolate and fix local Express Mail processing problems, to the extent that they are even recorded and maintained, are not centrally compiled. It is patently unreasonable and overly burdensome for the Postal Service to initiate a survey of

hundreds and hundreds of field personnel to compile their individual recollections of network operations fixes. This is especially true when one considers the fundamental irrelevance that such an undertaking would have to the issues in this proceeding, since any response to this interrogatory would simply discuss operational details about Express Mail with no material connection to the recommendation of Express Mail rates.

The Postal Service will therefore provide a response to part (e) of this interrogatory, and objects on the grounds of relevance and burden to the extent that OCA does not consider that response to be sufficient.

OCA/USPS-T34-6(a)-(e) and 7(a)-(e)

These interrogatories, in their entirety, read as follows:

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.

The Postal Service objects to parts (a) through (e) of these interrogatories on the grounds of relevance. The OCA requests Express Mail delivery commitment data between specific 5-digit ZIP Code origin and destination pairs, based on a specific date of mailing and time of acceptance (i.e., before or after the “cut off times” for Express Mail at the origin). Such detailed information as to the Express Mail service that is provided between specific 5-digit ZIP Codes is irrelevant to this proceeding.

Therefore, the Postal Service objects to parts (a) through (e) of these interrogatories. The Postal Service will provide responses to parts (f) and (g) (the responses to part (g) of each interrogatory will provide information as to the computer database that is used to derive Express Mail retail service commitments).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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