

# DOCKET SECTION

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BEFORE THE

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POSTAL RATE COMMISSION **Oct 7 2 50 PM '97**

WASHINGTON DC 20268-0001 POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. Particularly since the Postal Service is encouraging cooperation from the intervenors, I request that similar cooperation in liberally interpreting the requests made by my interrogatories and provide the desired information. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. All responses should be complete without reference to any previous Postal Rate Commission dockets.

October 7, 1997

Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-69      The response to DBP/USPS-9 subpart i referred to retail windows that are open 24 hours a day. Are there any other instances other than that?

DBP/USPS-70      The response to DBP/USPS-9 subpart j referred to instances where the mail might be delayed. [a] Are there any instances where the normal activity of the carrier would result delayed mail? In other words, are there any offices where the last dispatch is earlier than the normal latest return time of the carrier. [b] If your

response to subpart a is yes, explain how this would meet the requirements and service standards. [c] Provide any specific instructions which indicate that the late returning carrier should bring the collected mail to the processing center.

DBP/USPS-71      The response to DBP/USPS-9 indicates that Sunday and holiday mail collections are made and that there is no mail processing on Sunday and holidays. [a] What is the logic of making the collection without having the mail processed? [b] Wouldn't a Monday collection be a better utilization of the manpower?

DBP/USPS-72      The response to DBP/USPS-18 subparts b and c indicates that costs for retail products are not tracked. [a] Does this mean that the Postal Service enters into various selling arrangements without determining that it will result in a profit? [b] If not, please explain.

DBP/USPS-73      The response to DBP./USPS-24 subparts a, c, g, and i, indicates that Restricted Delivery, Return Receipt after mailing, and the ability to mail at other than a post office or with a rural carrier are not available for Return Receipt for Merchandise. [a] What is the logic of permitting Restricted Delivery for all types of accountable mail other than Return Receipt for Merchandise? [b] Since a record of delivery is made when the Return Receipt for Merchandise is delivered, what is the logic for not providing the Return Receipt for Merchandise after mailing? [c] Is a duplicate Return Receipt available for the Return Receipt for Merchandise service? [d] If not, what does a mailer do if the return receipt is not received or is received without being properly completed? [e] What is the logic for requiring Return Receipt for Merchandise to be mailed at a post office or with a rural carrier?

DBP/USPS-74      Please clarify your response to DBP/USPS-28 subpart u in light of the last sentence of POM 822.111. I am interested in the transaction between the delivering employee and the clearing clerk as opposed to the time that the clearing clerk must put the return receipt in the mail.

DBP/USPS-75 In your response to DBP/USPS-29 subpart a, [a] explain the difference between "check all return receipts to make sure that they are properly signed and dated" vs. "evaluate all return receipts ... to ensure that they are properly completed". [b] If there are any checks or evaluations which are not made by the clearing clerk, indicate what effort the Postal Service makes to ensure that the particular item on the return receipt is properly completed. [c] Who is responsible for ensuring that the requirements that are referred to in subparts c, g, and h have been properly followed? [d] Explain your use of the words "In general" in your responses to subparts b, d, and f.

DBP/USPS-76 In your response to DBP/USPS-31 subpart b, you were unable to confirm my statement. [a] Are there any situations where a delivery office may have an arrangement which allows for the return receipt to be signed for at a "later", more convenient time? [b] Are there any situations where a delivery office may not have the return receipts signed for at the time of delivery? [c] Explain and elaborate any positive response to subparts a and b.

DBP/USPS-77 In your response to DBP/USPS-32 subparts a and b, you indicate that it is a goal to achieve the signing for all accountable mail and the associated return receipt at the time of delivery regardless of the type of addressee or the number of articles involved. [a] Elaborate what you mean by a goal. [b] Does this goal have the support of management? [c] Does this goal apply to all delivery offices? [d] Do you agree that this goal should be attempted to be met by all delivery offices? [e] Explain any negative response to subparts b through d. [f] Are there any instances existing anywhere within the Postal Service where the signing for the accountable mail and the associated return receipt are, by default or by design, not completed at the time of delivery? [g] Provide details of any affirmative response to subpart f including the authority for and the method of delivery. [h] Elaborate on your response to the statement in reply to subpart b, "In some cases it is possible that the signature takes place after delivery." [i] In your response to subpart e, you indicated that it would be relatively rare for multiple pieces of articles requesting return receipts to be addressed to a single recipient. Does this apply to various government agencies, such as IRS and

the state tax departments, as well as other government agencies and large commercial organizations? [j] Confirm, or explain if you are unable to do so, that DMM Section D042.1.7b would place the requirement for obtaining the signature at the time of delivery from that of being a goal to that of being a regulation. [k] Does DMM Section D042.1.7 apply to all addressees within the service area of the United States Postal Service? [l] If not, provide a listing of any exceptions and the authority for doing so.

DBP/USPS-78 In your response to DBP/USPS-34 subpart i, [a] explain why a mailer should be required to pay for a return receipt when it was not an independent proof of delivery but had been completed at a point after the time of delivery. [b] Clarify your response to subpart o. My interrogatory related to the fact that if I am often required to obtain a duplicate return receipt just to get the information that I was supposed to be provided with in the first place, would the service appear to be less valuable to me because of the inconvenience caused.

DBP/USPS-79 In your response to DBP/USPS-35, [a] confirm that all DBCS and CSBCS sorters will trap Certified Mail. [b] Clarify Witness Moden's testimony on Page 7 that by the end of this year DBCS and CSBCS will be installed at all mail processing centers and that all incoming mail will be run through them so as to trap all incoming Certified Mail. [c] Provide an estimate of the percentage for your use of "virtually all" and "vast majority" in your response to subparts a through c. [d] Confirm, or explain if you are unable to do so, that there is no postal employee who is aware of the mail processing centers which do not trap 100% of their mail for Certified Mail letters.

DBP/USPS-80 Clarify your response to DBP/USPS-38 subpart e. [a] Is there any appropriate security provided for insured mail which can have an insurance value of \$5,000? [b] If so, explain the nature of it.

DBP/USPS-81 Clarify your response to DBP/USPS-40 subparts c and d. [a] Confirm, or explain if you are unable to do so, that if a mailer has a 15-ounce parcel containing merchandise that it will cost \$3.20 to mail and that if the piece weighs 17-

ounces it will cost \$3.15 or less to mail it. [b] What is the logic for having a rate which costs less for heavier but similar parcels?

DBP/USPS-82 Your response to DBP/USPS-47 did not explain why, since there were lower costs for the higher zones, that this did not result in lower rates [rather than no change in rates as is being proposed] for the higher zones.

DBP/USPS-83 Your response to DBP/USPS-53 subpart m, r, and s requires clarification. [a] If I were to compare two separate services and for each of the categories chosen to evaluate, one of the services was always equal to or better than the other service, why would a knowledgeable mailer choose to use the service which was always below or equal to the other service? [b] Please respond to my original subparts m, r, and s. [c] Subparts bb and cc refer to the rates being proposed in this Docket. The always be greater or equal refers to the price being proposed in this Docket. Please respond to the original interrogatories.

DBP/USPS-84 Your response to DBP/USPS-60 subpart e requires clarification. Provide examples of the security measures that may be utilized and also any reference to regulations or Headquarters memoranda [provide copies] on the topic.

DBP/USPS-85 In your response to DBP/USPS-62, you indicate the words "excluding contingency" a number of times. Explain the significance of that.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



David B. Popkin      October 7, 1997

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