

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-172-202]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. 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. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

July 5, 2006

Respectfully submitted,

R20061W172

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

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DBP/USPS-172            Please refer to your response to Interrogatory DBP/USPS-50. Please provide a clear copy of the attachment to the response. The "COLOR" column is not clear on the filed copy.

DBP/USPS-173            Please refer to your response to Interrogatory DBP/USPS-50. Please advise the changes that were made between this Appendix II and the Appendix II from the previous version of the Library Reference.

DBP/USPS-174            Please refer to your response to Interrogatory DBP/USPS-51. Please provide a clear copy of the attachments to the response.

DBP/USPS-175 Please refer to your response to Interrogatories DBP/USPS-50 and 51. Please confirm, or explain if you are unable to confirm, that the attachment for Appendix IX consists of two pages and that Page 1 of the attachment was incorrectly associated with the response to Interrogatory DBP/USPS-50.

DBP/USPS-176 Please refer to your response to Interrogatory DBP/USPS-55 subpart a. Did you mean to say pages 1 through 3 rather than just page 3 of Appendix I of USPS-LR-L-134? In any case both Appendix I and the attachment to the response to Interrogatory DBP/USPS-55 are the same listing of those 3-digit ZIP Codes that are covered in the EXFC Program. Please respond to the original request.

DBP/USPS-177 Please refer to your response to Interrogatory DBP/USPS-55 subpart b. Your response was only a general response and did not respond to the original request, namely, an explanation for each of the 3-digit ZIP Code prefixes that are not a part of the EXFC Program. For example, 999 - Ketchikan AK is not a part of the EXFC Program. Please explain specifically why 999 is not included. Please respond to the original request.

DBP/USPS-178 Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired.

[a] When was the PETE Program retired?

[b] Why was the PETE Program retired?

[c] What methods does the Postal Service utilize to evaluate the performance of Priority Mail?

[d] Please provide information similar to that which was provided in Library Reference USPS-LR-L-134 for the PETE replacement program.

[e] What sections of Library Reference USPS-LR-L-134 are no longer valid?

DBP/USPS-179 Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired and yet some Interrogatories have been responded to as if it is still an operational program [for example, Interrogatory DBP/USPS-81]. For each of the responses that responded as if PETE was an active program, please file updated responses to cover the new Priority Mail evaluation program.

DBP/USPS-180            Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired and yet some Interrogatories have been responded to stating that it has been retired [for example, Interrogatory DBP/USPS-55]. For each of the responses that responded that PETE was an inactive program, please file updated responses to cover the new Priority Mail evaluation program.

DBP/USPS-181            [a]    Does the Postal Service believe that efforts made to improve the EXFC scores have resulted in improved scores and First-Class Mail performance?

[b]    If not, why not? If so, please discuss and explain the specific methods that have been utilized to improve First-Class Mail performance.

DBP/USPS-182            Please confirm, or explain if you are unable to confirm, the following:

[a]    Managers' compensation is affected by their EXFC scores.

[b]    As a result of the EXFC Program, blue collection boxes are scanned upon collection.

[c]    As a result of the EXFC Program, a missed or early collection of a blue collection box will result a new collection being made to collect the mail to allow for a timely dispatch.

[d]    As a result of the EXFC Program, missent mail, either in the same office or in other offices, will result in specific efforts to ensure that the mail is delivered in a timely manner, even if it requires separate trips, rather than just putting it back into the system and allowing it to be delivered the following day.

DBP/USPS-183            Please confirm, or explain if you are unable to confirm, that, in general, if an individual post office removes one or more collection boxes they may believe they will have either improved EXFC scores and/or an easier time to achieve the EXFC score.

DBP/USPS-184            Please confirm, or explain if you are unable to confirm, that, in general, if an individual post office advances the collection time of one or more collection boxes they may believe they will have either improved EXFC scores and/or an easier time to achieve the EXFC score.

DBP/USPS-185                    Please advise whether the actions noted in Interrogatories 182 through 184 are applied equally at both offices that are a part of the EXFC Program as well as at those that are not.

DBP/USPS-186                    Please refer to your response to Interrogatory DBP/USPS-63. Your response refers to an obsolete manual and does not specifically respond to the question, namely, an EXFC dropper will report that a particular letter was mailed in a particular collection box at a particular time. This Interrogatory is attempting to evaluate the specific methods that are utilized to ensure that this data is accurate. For example, one possible method appears to be that the dropper will call on a cell phone immediately after mailing the mail. Another appears to be that the dropper will be required to report the collection box number to help "prove" that the mail was actually deposited in that box.

DBP/USPS-187                    Please refer to your response to Interrogatory DBP/USPS-64.

[a]     Please confirm, or explain if you are unable to confirm, that a blue collection box must be collected on or after the time posted on the box.

[b]     How late after the time posted on the box may the collector make the collection?

[c]     In the example provided in your original response, please confirm, or explain if you are unable to confirm, that the box could have been collected at 2:20 PM.

[d]     Please explain how the dropper activity would be considered if the mail was collected and processed on a Tuesday when it utilized a Wednesday date.

[e]     Does IBM have access to all collection times at a given box or only the last collection of the day?

DBP/USPS-188                    Please refer to your response to Interrogatory DBP/USPS-66 subpart a. Your response refers to an obsolete manual and does not specifically respond to the question, namely, an EXFC reporter will report that a particular letter was received on a particular day. This Interrogatory is attempting to evaluate the specific methods that are utilized to ensure that this data is accurate. For example, one possible method appears to be that someone could confirm that a given letter was in a particular mailbox and that it was reported on the correct day.

DBP/USPS-189 Please refer to your response to Interrogatory DBP/USPS-66 subpart b. This subpart was not responded to. The request relates to how the USPS will independently conduct a test of reporter accuracy.

DBP/USPS-190 Please refer to your response to Interrogatory DBP/USPS-69. Has this method ever been utilized by the United States Postal Service?

DBP/USPS-191 Please refer to your response to Interrogatory DBP/USPS-70. This interrogatory asks a specific question that can be answered regardless of the method of evaluating service performance. Please respond to the questions that were asked.

DBP/USPS-192 Please refer to your response to Interrogatory DBP/USPS-71. This interrogatory asks a specific question that can be answered regardless of the method of evaluating service performance. Please respond to the questions that were asked.

DBP/USPS-193 Please refer to your response to Interrogatory DBP/USPS-76.

[a] Please advise how IBM selects the specific boxes to utilize for their droppers.

[b] Does the CPMS database allow for downloading of data by IBM so that they can utilize it in their programs for random selection? Please explain and discuss.

[c] Does the CPMS database allow for random selection of collection boxes for IBM to utilize for droppers?

DBP/USPS-194 Please refer to the two sample size parcels that were utilized in the example in Interrogatory DBP/USPS-143 subpart d.

[a] Please confirm, or explain if you are unable to confirm that if instead, the actual dimensions of the larger parcel were 18.49 inches each, the dimension weight utilizing the unrounded 18.49 inches would be 33 pounds while the dimension weight utilizing the 18 inches as the rounded value would only be 31 pounds.

[b] Please confirm, or explain if you are unable to confirm that if instead, the actual dimensions of the smaller parcel were 13.49 inches each, the dimension weight utilizing the unrounded 13.49 inches would be 13 pounds while the dimension weight utilizing the 13 inches as the rounded value would only be 12 pounds.

[c] Will the rounding off to the nearest inch be either a permissible or a mandatory procedure in determining if the parcel exceeds one cubic foot in the first place? Please explain.

DBP/USPS-195 Please confirm, or explain if you are unable to confirm, that the largest dimension weight possible for a parcel that does not exceed 108 inches length plus girth would be 52 pounds.

DBP/USPS-196 Please provide a chart that will show for one pound increments from 1 pound to 52 pounds along the left side of the chart and the following data along the top of the chart:

[1] The number of Priority Mail parcels destined to Zone 5 or beyond.

[2] The number of those parcels expected to be one cubic foot or greater.

[3] The number of those parcels that are expected to have a higher dimension weight postage than an actual weight postage.

The data should be provided for one or more recent one year period.

DBP/USPS-197 Please provide a chart that will show for one pound increments from 1 pound to 20 pounds along the left side of the chart and the following data along the top of the chart:

[1] The number of Priority Mail parcels destined up to Zone 4 including Local.

[2] The number of those parcels expected to have a length plus girth of 84 inches or more.

The data should be provided for one or more recent one year period.

DBP/USPS-198 Please provide a chart that will show for one pound increments from 1 pound to 70 pounds along the left side of the chart and percentage of parcels that are transported by air for local parcels and for each of the 8 zones separately along the top of the chart. A total for all parcels should be shown below the 70 pound line on the chart. The data should be provided for one or more recent one year period.

DBP/USPS-199 [a] With respect to irregularly shaped Priority Mail parcels, please confirm, or explain if you are unable to confirm, that the determination of the length plus girth [which is required to determine the implementation of the balloon rate as well as to determine if the parcel is mailable - less than 108 inches] will use a different value for the

length and/or width and/or height than will be utilized for the determination of the dimension weight.

[b] Please confirm, or explain if you are unable to confirm, that the measurement of length plus girth will be made in the same manner whether the mailpiece is Parcel Post, Priority Mail, or Express Mail.

DBP/USPS-200 Please advise both the dimension weight and the length plus girth measurement for the following shaped parcels. Disregard whether the dimension weight or balloon rate or oversize limitations apply since I am interested in the calculation for different shapes and am aware of when the implementation would apply. Please fully explain how each calculation was made. If any additional information is required to make the calculation, please assume an appropriate value and provide it in your response rather than not answering the question.

[a] A box with a length of 15 inches and a width and height of 10 inches.

[b] A box with a length of 15 inches and a width of 10 inches and a height of 9 inches.

[c] A box with a length of 15 inches and a cross section that is perpendicular to the length that is a trapezoid with a base of 10 inches and a height of 9 inches on one side and 10 inches on the other side.

[d] A round mailing tube that is 30 inches long and 5 inches in diameter.

[e] A triangular shaped box that was 30 inches long and had triangular sides of 10 inches on each side.

[f] A triangular shaped box that was 30 inches long and had triangular sides of 10 inches on two of the sides and 5 inches on the third side.

[g] An automobile tire shaped parcel that has an overall outside diameter of 30 inches and an irregularly shaped cross section [if one were to cut through the tire at one point] with a total girth measurement of 20 inches.

[h] Same as subpart g except that the cross section is a circle with a circumference of 20 inches.

[i] A parcel in the shape of a tree. The length of the tree is 48 inches and the maximum girth around the collapsed branches is 20 inches, around the trunk is 10 inches, and around the root system is 30 inches.

[j] Two separate boxes that are glued together. The bottom box has a length of 15 inches and a height and width of 8 inches each. The top box has a length of 13 inches and a height and width of 7 inches each.

[k] Same as subpart j except that in addition to the glue the parcels are taped together so that the tape extends out in a triangular shape over part of the bottom of the smaller top box.

[l] A box with a length of 15 inches and a cross section that is perpendicular to the length that is a trapezoid with a base of 10 inches and a height of 5 inches on one side and 10 inches on the other side.

DBP/USPS-201 Please provide a chart which shows the number of Priority Mail flat rate envelopes that were mailed in a recent one year period broken out in one ounce increments up to 13 ounces, for 13 to 16 ounces, and in one pound increments above 16 ounces.

DBP/USPS-202 Please provide a series of three charts showing the number of Priority Mail flat rate boxes that were sent in each of the pound increments and to each of the different zones. Please provide three separate charts. One chart where the postage for the flat rate box is less than the non-flat postage rate, the second where the rates are the same, and the third where the postage rate for the flat rate box is greater than the non-flat postage rate.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day 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 July 5, 2006

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