

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. BERKELEY (OCA/USPS-T34-10-11)
(July 11, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T34-10. This interrogatory seeks information to clarify the Express Mail delivery guarantee for customers that purchase Post Office to Addressee Express Mail service. Please refer to your response to OCA/USPS-T34-4.

- a. Refer to your response to part a. Is there a location on Mailing Label 11-B for the “origin” retail window clerk to specify the “2nd Delivery Day” when an Express Mail piece is mailed on a Friday, and there is no Second Day delivery? Please explain.
- b. Refer to your response to part a. Does the Postal Service intend to update Mailing Label 11-B to include a check-off box for the “origin” retail window clerk to specify the “2nd Delivery Day?” Please explain.
- c. Refer to your response to part c. Please confirm that the retail window clerk manually writes the guaranteed *delivery date and time* (i.e., the month/day, and Noon or 3PM) on Mailing Label 11-B, rather than the delivery commitment in the form of “Next Day Noon,” “2nd Day 3PM,” etc. If you do not confirm, please explain.
- d. Refer to your response to part d. Please confirm that the retail window clerk obtains the guaranteed *delivery date and time* (i.e., the month/day, and Noon or 3PM) information, rather than the delivery commitment in the form of “Next Day Noon,” “2nd Day 3PM,” etc., from the POS terminal. If you do not confirm, please explain.
- e. Refer to your response to part e. For Express Mail acceptance at facilities that do not have POS terminals, please confirm that acceptance personnel obtain the guaranteed *delivery date and time* (i.e., the month/day, and Noon

or 3PM) information, rather than the delivery commitment in the form of “Next Day Noon,” “2nd Day 3PM,” etc., from either IRTs or hardcopy directories. If you do not confirm, please explain.

- f. Refer to your response to part g., where it states, “The expchart file contains cut-off times and corresponding service commitments for each destination ZIP Code.” Based upon your understanding, does the service commitment information in the expchart file consist of delivery date and time (i.e., the month/day, and Noon or 3PM) information, rather than the delivery commitment in the form of “Next Day Noon,” “2nd Day 3PM,” etc.? Please explain.
- g. Refer to your response to part g., where it states, “The expchart file contains cut-off times and corresponding service commitments for each destination ZIP Code.” Is it your understanding that the software in the expchart file is not programmed to provide delivery date and time (i.e., the month/day, and Noon or 3PM) information as the service commitment for Express Mail? Please explain.

OCA/USPS-T34-11. This interrogatory seeks information to clarify 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 response to OCA/USPS-T34-6(f), where it states “It is my understanding that *service commitment* information is available for every day of the year . . .” (Emphasis added)

- a. Please confirm that the “service commitment information” that you claim “is available for every day of the year” is available for a future mailing date during

any day of the year, and for all Zip Code pairs. If you do not confirm, please explain.

- b. How far into the future is “service commitment information” available for a future mailing date? Please explain.
- c. Please confirm that the “service commitment information” that you claim is available is delivery date and time (i.e., the month/day, and Noon or 3PM) information. If you do not confirm, please explain.