

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

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-
151 AND 157

I move to compel responses to the interrogatories submitted to the United States Postal Service that have been objected to by them.

July 25, 2006

Respectfully submitted,

R20061MTC10A151157

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

On July 3, 2006, I submitted Interrogatories DBP/USPS-151 and 157. On July 13, 2006, the Postal Service filed an objection to these interrogatories.

The interrogatory reads as follows:

DBP/USPS-151 [a] Please provide me a listing of the percentage of the retail service windows that are open on Saturday countrywide as well as a separate listing broken out by District.

[b] Please provide me a listing of the percentage of the post office box lobbies that are open on Saturday countrywide as well as a separate listing broken out by District.

[c] Please provide the criteria that are considered for the establishment of Saturday post office lobby hours at a particular facility.

[d] Please provide the criteria that are considered for the establishment of Saturday retail window service hours at a particular facility.

The Postal Service partially objected to subparts a and b on the grounds of relevance and burden. The Postal Service indicated that they would provide countrywide data. That data were due to be filed by July 17, 2006, and has yet to be filed some 8 days later.

Furthermore, the Postal Service did not object to subparts c and d of this interrogatory and therefore the response should have been made by July 17, 2006, and has yet to be filed some 8 days later.

In Docket R2005-1 in response to Interrogatory DBP/USPS-126, the Postal Service advised that 76% of post offices provided retail window service on Saturday. I followed-up on that response with Interrogatory DBP/USPS-226. In response to subpart e, the Postal Service provided the data broken out by each of the nine Areas.

DBP/USPS-226. Please refer to your response to DBP/USPS-126.

(a) Please provide the requirements and associated regulations which relate to the level of window service and all forms of delivery service that must and/or should be provided on a Saturday.

(b) Please indicate any insight as to why 24% of the post offices feel that it is inappropriate to provide retail window service on Saturdays.

(c) Does the 76% of post offices that are open on Saturday represent only independent post offices or does it also include classified stations and branches and/or contract station and branches?

(d) If it includes any stations and/or branches, please provide a figure based on independent post offices only.

(e) Please provide a breakdown for each of the Areas in the country.

(f) Please confirm, or explain if you are unable to confirm, that there is now a recent policy to extend the retail window hours both on weekdays and on Saturdays.

(g) What is the current policy with respect to either increasing or decreasing the availability of retail window service on Saturdays?

RESPONSE:

(a) According to POM section 126.42: "Window service is provided on Saturdays if there is a demonstrated need. Normally, such service does not exceed 4 hours. Postmasters must obtain approval from the next higher management level if more hours are necessary to meet customer needs. At financial units serving business areas, or facilities serving communities where many residents leave on weekends, retail service may be closed if service is available at other postal units, contract stations, or selfservice postal centers. Postmasters must post signs telling customers of locations and hours of such services."

(b) As noted in the response to part (a), the decision whether to provide window service on Saturdays is a local decision based on customer needs. For example, in areas where residents leave on weekends, retail service may be closed if service is available at other postal locations, contract stations, or self-service postal centers.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY**

(c) The figure provided in the response to DBP/USPS-126 represents retail sites that submit Form 1412 for Saturday retail activities. This could include post offices as well as stations or branches.

(d) The data is not available in the format requested.

(e) Capital Metro: 84%

Eastern: 87%

Great Lakes: 83%
New York Metro: 83%
Northeast: 90%
Pacific: 44%
Southeast: 82%
Southwest: 65%
Western: 70%

(f) The Postal Service is planning to extend and adjust hours of service at Postal Service retail locations nationally where customer traffic dictates the need.

(g) Where districts believe there is a need to better serve customers, there will be strategically located USPS retail sites open until 3 PM on Saturdays.

The data provided showed a range varying from only 44% in the Pacific Area to 90% in the Northeast Area. Because of the large variation in the availability of this service, I wanted to evaluate the data on a District-wide basis in these proceedings. This information relates to the value of service of all the various classes of mail that are processed at a retail service window. The Postal Service is extending retail window hours in this area at many post offices to 7 PM on weekdays and 4 PM on Saturday. Apparently, they believe in the value of these extended hours to the value of service to customers.

I certainly would see the appropriateness of providing the data broken out by Area in a manner similar to that which was provided in 2005. A breakdown by Districts in the three Areas that were in 2005 at 70% or less should provide useful data.

This data should be readily available at each district and an e-mail should be able to secure the District's data within a few minutes not the several days of continuous work claimed by the Postal Service.

The interrogatory reads as follows:

DBP/USPS-157 This interrogatory relates to the ability of a postal customer to claim mail for which a notice has been left, such as accountable mail, on a non-holiday Saturday at a facility that does not have retail window service available on that Saturday. If there is a different pick-up rule for a carrier customer vs. a post office box customer, please explain.

[a] Is it mandated that this ability exist?

[b] If not mandated, is it the normal custom to provide such service?

[c] If not, why not?

The Postal Service objects to this Interrogatory on the grounds of relevance.

This Interrogatory relates to the value of service of each of the classes of mail that a customer would claim at a post office facility. The Postal Service is extending retail window hours in this area at many post offices to 7 PM on weekdays and 4 PM on Saturday. Apparently, they believe in the value of these extended hours to the value of service to customers.

For the reasons stated, I move to compel response to the referenced interrogatory since it is reasonably calculated to lead to the discovery of admissible evidence.

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 25, 2006
