

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
SUSAN W. BERKELEY TO INTERROGATORIES OF THE
OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T34-10-11)
(July 25, 2006)

The United States Postal Service hereby provides the responses of witness Susan W. Berkeley (USPS-T-34) to interrogatories OCA/USPS-T34-10-11, filed on July 11, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

- (a) If a piece is guaranteed for delivery on the “Second Delivery Day”, there is a box on Label 11-B, dated March 2004, that allows the acceptance employee to

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specify "Second Delivery Day." The box is in the middle of the top row in the Origin Section.

(b) This box already exists on Label 11-B, dated March 2004. Please see my response to part (a).

(c) There is a box on Label 11-B that allows the retail associate to manually write the month and day of the delivery date, and a box that allows the associate to check whether the delivery time is Noon or 3PM. Additionally, there is a box on the Mailing Label 11-B that allows the retail associate to check whether the commitment is for Next Day, 2nd Day, or 2nd Delivery Day.

(d) It is my understanding that POS ONE terminals and IRTs provide both forms of information; that is, they provide the specific guaranteed delivery date and time as well as the commitment information in the form of "Next Day/2nd Day/2nd Del. Day."

(e) For the IRTs, please see my response to part (d) above. It is my understanding that manual offices have a directory that lists those destinations with Next Day commitments, and whether those commitments are for Noon or 3PM delivery. It is also my understanding that the directory further indicates whether those commitments are valid for articles accepted on weekends and holidays. The retail associate uses that information, along with his or her

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knowledge of the local cut-off time and the delivery exception list (if delivery is targeted for a Sunday or holiday), to calculate the guaranteed delivery date.

(f) - (g) It is my understanding that there are no dates in the expchart file.

Rather, each record in an expchart file contains a destination ZIP Code followed by a string of cut-off times relative to the available service commitments. It is also my understanding that the expchart file is used in conjunction with separate data files and system logic in order to determine the precise date and time of the delivery guarantee.

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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.

RESPONSE:

(a) Confirmed. Service commitment data between each origin-destination ZIP Code is available to the Postal Service for every day of the year, though such data is not in the retail terminals. Please see my response to OCA/USPS-T34-8(a).

(b) Express Mail directories are updated approximately every two months. The “service commitment information” is, therefore, assured up to the date in which the next update occurs.

(c) It is my understanding that there is no practical way for a retail associate to use POS ONE terminals and IRTs, which provide information in the form of month/day and Noon/3PM, to determine the “service commitment information” for a future date. See my response to OCA/USPS-T34-8(a). Offices with a

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hardcopy directory could provide future “service commitment information” in month/day and Noon/3PM format up until the date of the next directory update by applying the information in the hardcopy directory in the manner discussed in my response to OCA/USPS-T34-10(e).