

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS MITCHUM
(OCA/USPS-T40-52-53 AND 59-60)

The United States Postal Service hereby provides its responses to the above-listed interrogatories of the Office of the Consumer Advocate, filed on July 10, 2006, and redirected from witness Mitchum.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
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RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS MITCHUM

OCA/USPS-T40-52. This interrogatory seeks to clarify the value of Confirm service to the Postal Service. Please refer to your testimony at page 14, lines 22-23.

- a. Please confirm that the data generated by mailpieces entered with PLANET Codes also has important information value to the Postal Service. If you do not confirm, please explain.
- b. Please confirm that the data generated by mailpieces entered with PLANET Codes provides the Postal Service with information on mail flows during processing, permitting evaluation and improvements of its mail processing operations. If you do not confirm, please explain.
- c. Please confirm that on balance, the larger the number of mailpieces entered with PLANET Codes, the greater the information value to the Postal Service on the performance of its mail processing operations. If you do not confirm, please explain.

RESPONSE:

a-c. Not confirmed. See the response to OCA/USPS-T40-35(f-h), redirected to the Postal Service.

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TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
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OCA/USPS-T40-53. This interrogatory seeks to clarify the value of Confirm service to the Postal Service. Please refer to your testimony at page 14, lines 22-23. Please confirm that mailpieces entered with PLANET Codes are essential for future Postal Service programs, including seamless verification, postage accountability, and validation and improvement of address quality. If you do not confirm, please explain.

RESPONSE:

It is my understanding that many of the cited programs will be dependent on mailers providing information embedded in barcodes. I believe it is the 4-state barcode, more so than the PLANET code, that will enable these future developments.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS MITCHUM

- OCA/USPS-T40-59.** This interrogatory seeks information about the use of Confirm service in association with vote-by-mail programs and absentee ballots.
- a. Has the Postal Service used PLANET Codes to evaluate service performance for vote by mail programs or absentee ballots for elections to state or local office? Please explain, and identify the elections where PLANET Codes were used, and discuss the service performance achieved.
 - b. Is the Postal Service aware of state or local governments that have used Confirm service to evaluate service performance for vote-by-mail programs or absentee ballots for elections to state or local office? Please explain, and identify the elections where Confirm service was used, and discuss the service performance achieved.
 - c. In the mayoral election for New Orleans on April 22, 2006, to measure recovery of service performance after a disaster, did the Postal Service use Confirm service to evaluate service performance for absentee ballots in that mayoral election? Please explain, and discuss the service performance achieved.

RESPONSE:

- a. The Postal Service has not used PLANET Codes to evaluate service performance for vote by mail programs or absentee ballots.
- b. The Postal Service is not aware of state or local governments that have used Confirm service to evaluate service performance for vote-by-mail programs or absentee ballots for elections of state or local office. Election boards have been advised of the potential to use Confirm service to enable the election boards to track the status of ballots being mailed to and returned by voters.
- c. No, the Postal Service did not use Confirm for the purpose of measuring or evaluating service performance after a disaster. The purpose for the use of Confirm on outgoing absentee ballots sent to voters was to provide the Secretary of State's office an indication that the voter was likely to have received the requested ballot. The purpose for the use of Confirm on the incoming absentee

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS MITCHUM

OCA/USPS-T40-59, Page 2 of 2

ballots returned by the voter to the Secretary of State's office was to validate that all ballots returned via the mail were received at the Secretary of State's office.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS MITCHUM

OCA/USPS-T40-60. This interrogatory seeks information on the use of PLANET Codes to evaluate service performance. Please refer to the Office of Inspector General (OIG) Report No. DR-MA 06-001, concerning allegations of delayed mail in Las Cruces, New Mexico, and the Appendix to that report, which contains "Management's Comments." Bullet five of Management's Comments states, "Planet code testing began on December 28, 2005 to provide an analysis and to track failures, trends and problem areas."

- a. Please describe and explain the PLANET Code testing that began on December 28, 2005.
- b. Please explain the results of the PLANET Code testing to date "to track failures, trends and problem areas."

RESPONSE:

a. The PLANET code testing was locally initiated. Las Cruces seeded 30 pieces with 5 pieces destined to Las Cruces and the remainder to other ZIP Codes across the nation.

b. The Postal Service used Planet Codes to review their operations and identify opportunities to improve service. The Southwest Area (SWA) monitored the service performance of Las Cruces and sent in a service team to Las Cruces in December 2005 after the initial OIG review. Progress on mail processing issues, such as meeting the originating processing demands daily, reviewing work schedules of employees, and routing incoming mail through the El Paso Area Distribution Center, has been monitored to help improve service.