

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-T40-45-48)

The United States Postal Service hereby provides its responses to the above-listed interrogatories of the Office of the Consumer Advocate, filed on June 30, 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:

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July 26, 2006

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

OCA/USPS-T40-45. Please provide a report that sets forth the delivery times for First-Class letters (i.e. from date of entry to date of last DPS scan), by quarter, from the inception of Confirm to date. If the data are available only for a shorter period of time, then provide the delivery times, by quarter, for the available periods.

- a. Please specify the quarters involved and the number of scans used to develop the delivery time figures.
- b. If data are unavailable as requested above for less than the full set of quarters specified in the predicate of the question, explain why they are unavailable.
- c. OCA is not seeking any information that will lead to specific-mailer identification.

RESPONSE:

a-b. As noted in witness Mitchum's responses to OCA/USPS-T40-23, 25, and 26, the preshipment notification scan is not reliable, so no reliable measure of days to delivery is available.

c. Not applicable.

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

OCA/USPS-T40-46. Please provide a report that sets forth the delivery times for First-Class flats (i.e. from date of entry to date of last DPS scan), by quarter, from the inception of Confirm to date. If the data are available only for a shorter period of time, then provide the delivery times, by quarter, for the available periods.

- a. Please specify the quarters involved and the number of scans used to develop the delivery time figures.
- b. If data are unavailable as requested above for less than the full set of quarters specified in the predicate of the question, explain why they are unavailable.
- c. OCA is not seeking any information that will lead to specific-mailer identification.

RESPONSE:

a-b. As noted in witness Mitchum's responses to OCA/USPS-T40-23, 25, and 26, the preshipment notification scan is not reliable, so no reliable measure of days to delivery is available.

c. Not applicable.

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

OCA/USPS-T40-47. Please provide a report that sets forth the delivery times for Standard Mail letters (i.e. from date of entry to date of last DPS scan), by quarter, from the inception of Confirm to date. If the data are available only for a shorter period of time, then provide the delivery times, by quarter, for the available periods.

- a. Please specify the quarters involved and the number of scans used to develop the delivery time figures.
- b. If data are unavailable as requested above for less than the full set of quarters specified in the predicate of the question, explain why they are unavailable.
- c. OCA is not seeking any information that will lead to specific-mailer identification.

RESPONSE:

a-b. As noted in witness Mitchum's responses to OCA/USPS-T40-23, 25, and 26, the preshipment notification scan is not reliable, so no reliable measure of days to delivery is available.

c. Not applicable.

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

OCA/USPS-T40-48. Please provide a report that sets forth the delivery times for Standard Mail flats (i.e. from date of entry to date of last DPS scan), by quarter, from the inception of Confirm to date. If the data are available only for a shorter period of time, then provide the delivery times, by quarter, for the available periods.

- a. Please specify the quarters involved and the number of scans used to develop the delivery time figures.
- b. If data are unavailable as requested above for less than the full set of quarters specified in the predicate of the question, explain why they are unavailable.
- c. OCA is not seeking any information that will lead to specific-mailer identification.

RESPONSE:

a-b. As noted in witness Mitchum's responses to OCA/USPS-T40-23, 25, and 26, the preshipment notification scan is not reliable, so no reliable measure of days to delivery is available.

c. Not applicable.