

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 MITCHUM
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T40-61-63)

The United States Postal Service hereby provides the responses of witness Mitchum to the above-listed interrogatories of the Office of the Consumer Advocate, filed on July 12, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-61. This interrogatory seeks information on Confirm service volumes.

- a. Please confirm that the number of First-Class and Other mailpieces for Destination and Origin services, and the number of such mailpieces that have PLANET Codes, is contained in the Confirm service preshipment notifications (i.e., EMD files). If you do not confirm, please explain.
- b. For Fiscal Years 2003, 2004, and 2005, from information available in the Confirm service preshipment notifications (i.e., EMD files), please provide a table showing the following: The total number of First-Class and Other mailpieces for Destination and Origin services, and the percent of such mailpieces that have PLANET Codes. If the requested information is not available for all three fiscal years, please provide the requested information for the most recent fiscal year or other period.

RESPONSE:

- a. Not confirmed. As noted on pages 85-87 of the Confirm users guide, the mailer only provides the number of mailpieces with PLANET Codes (EMD element #23). The provision of information with regard to the class and shape of mail for the mailing are optional. As my past responses have noted (OCA/USPS-T40-20, 22, 23, 35(a-e), 38, 39, and 41), the data provided in the preshipment notifications are often not reliable. Mailers typically use Confirm service as it was intended, a tool for identifying the location of their mail within the mail stream. Additionally, Origin Confirm does not use EMD files as these are pieces of mail being shipped to the mailer.
- b. As noted in the response to part a, the quality of these data are questionable and incomplete. Additionally, in some instances, mailers send EMD files but never actually enter a mailing that corresponds to the EMD. The data are stored a maximum of 30 days and are neither easily accessible nor reliable as a source for the information requested.

RESPONSE OF POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-62. This interrogatory seeks information on the relationship of Confirm service to other Postal Service mail programs.

- a. Please confirm that OneCode Address Change Service (ACS), OneCode Confirm, and other future mail service programs, such as “Surface Visibility” and “Seamless Acceptance,” will utilize the same data scanning and storage systems insofar as they rely on mailpiece-level observations. If you do not confirm, please explain.
- b. Please confirm that the data scanning and storage system used for OneCode Address Change Service (ACS), and OneCode Confirm, and other future mail service programs, such as “Surface Visibility” and “Seamless Acceptance,” will be the same data scanning and storage system used by Confirm subscribers insofar as they rely on mailpiece-level observations. If you do not confirm, please explain.

RESPONSE:

a-b. Not confirmed. While the same infrastructure will be used to capture the scans, Confirm service uses its own servers for disseminating its data. The limited period of storage after the dissemination is complete will be in the same storage system as the services you mention, but the data for the separate products will be stored separately as different data are needed for each product.

RESPONSE OF POSTAL SERVICE WITNESS MITCHUM
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-63. This interrogatory seeks information on scan data from Confirm service.

- a. Please confirm that at the present time Confirm subscribers may obtain from the Postal Service, at the subscriber's option, scan data consisting of the first scan, the last scan, or all scans from a mailpiece. If you do confirm, do Silver and Gold subscribers pay only for the additional scans obtained? If you do not confirm, please explain.
- b. If you do confirm part a, above, will this option remain available to Confirm subscribers under your pricing and classification proposal for Confirm service? If the option will remain available, will Silver and Gold subscribers pay only for the additional scans obtained? Please explain.
- c. Assume two mailpieces displaying identical PLANET Codes included in the same preshipment notification (i.e., EMD file) for the same subscriber. Both mailpieces are addressed to the same delivery point, and each mailpiece receives three scans. Does Confirm service identify two separate mailpieces with three scans each, or one mailpiece with six scans? Please explain.
- d. Assume a mailpiece displaying a PLANET Code is forwarded to a new address, after being transported to the delivery unit servicing the former (i.e., old) address. Based upon the number of scans for that mailpiece, does Confirm service identify one mailpiece or does it identify two separate mailpieces? Please explain.

RESPONSE:

- a. Not confirmed. This option does not provide the last scan that will necessarily occur on a mailpiece. It represents the last scan on what is identified as a unique mailpiece since the last time the subscriber received data.
- b. No. See response to part c. There will not be Gold and Silver Subscribers under the proposed pricing structure.
- c. The Confirm service distributes scans; it does not identify mailpieces.
- d. As long as the PLANET code and PostNet Code can be read by the optical scanners a scan record will be generated. As noted in part c, Confirm service does not identify mailpieces.