

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INSTITUTIONAL INTERROGATORIES FROM DAVID POPKIN  
DBP/USPS-387, 404-07, 409-12  
(August 7, 2006)

The United States Postal Service hereby provides its responses to the following institutional interrogatories from David Popkin: DBP/USPS-387, 404-07, 409-12, filed on July 24, 2006.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN

**DBP/USPS-387.** Please refer to your response to Interrogatory DBP/USPS-174. Please advise the weight of the 1st, 2nd, 3rd, and 5th mailpieces listed on page 1.

**RESPONSE:**

12, 8, 8, and 4 ounces, respectively.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN

**DBP/USPS-404.** Please refer to your response to Interrogatory DBP/USPS-187 subpart a. Please confirm, or explain if you are unable to confirm, that mail must be collected from a blue collection box on or after the time posted on the box.

**RESPONSE:**

Confirmed.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN

**DBP/USPS-405.** Please refer to your response to Interrogatory DBP/USPS-187 subparts b and c. Please confirm, or explain if you are unable to confirm, that in many areas of the country the Postmaster and/or his/her staff will set the time of many, most, or almost all of the blue collection boxes under their jurisdiction to the same time even though the collection will take more than 20 minutes and the later boxes will be collected more than 20 minutes after the time posted on the box. For example, a given District might mandate all of the boxes to have either a 1 PM weekday collection or to have both a 1 PM and 5 PM weekday collection and the time necessary to make the collection will exceed 20 minutes.

**RESPONSE:**

Unable to confirm. No nationwide survey or other data collection has been identified that collected the information on the conditions specified in this question.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-406.** Please refer to your response to Interrogatory DBP/USPS-187 subpart d. What action would be taken with respect to the tallying of the involved mail[?]

**RESPONSE:**

Interrogatory DBP/USPS-187(d) contains insufficient information to formulate a complete response, both because the terms used are amenable to multiple definitions and because no other information about the mail piece is proffered. However, if the thrust of the question entails mail that is entered a day before it was supposed to be entered, the previous response indicating this would be "Anomalous" accurately reflects that such data would not inform EXFC results.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-407.** Please refer to your response to Interrogatory DBP/USPS-187 subpart e. You have indicated that IBM retrieves information from the CPMS database. Does the CPMS database that they utilize have all of the collection times of the day or only the last collection time of the day?

**RESPONSE:**

This question was already answered in the cited interrogatory response: "IBM retrieves information from the CPMS database." However, IBM only downloads collection times needed for EXFC, meaning the last collection time of the day.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN

**DBP/USPS-409.** Please refer to your response to Interrogatory DBP/USPS-48 subpart b. The data in the OVNITE, 2DAY, and 3DAY columns is from PQ 2 FY 2005. Please update this information to the latest available quarter.

**RESPONSE:**

Data in the chart is from Q2 FY2006.

CODE	TYPE	WIDTH	LENGTH	ADDR	ZIP	CODE	POST	CFM	OVNITE	2DAY	3DAY	
A	C	4.25	6	PRIN	5	NO	MTR	YES	92.58	85.60	82.84	A
B	C	4	6	HAND	5	NO	STM	NO	88.03	81.66	68.70	B
C	L	4.75	6.4375	HAND	5	NO	STM	NO	96.13	91.18	89.58	C
D	F	9	12	HAND	5	NO	STM	NO	87.71	76.62	69.77	D
E	F	9	12	PRIN	5	NO	MTR	YES	86.53	74.49	69.98	E
F	L	4.1875	9.4375	PRIN	9	NO	MTR	YES	94.75	89.69	87.33	F
G*												G
H	L	4.125	9.4375	HAND	5	NO	STM	NO	96.16	91.63	88.72	H
I	L	3.625	6.5	HAND	5	NO	STM	NO	94.08	88.98	87.99	I
J	L	4.125	9.4375	PRIN	5	NO	STM	YES	95.75	90.74	87.74	J
K	L	4.125	9.4375	PRIN	9	NO	MTR	YES	96.12	91.63	87.94	K
L	L	4.875	7.875	PRIN	9	NO	MTR	YES	94.28	88.72	85.99	L
M	L	4.125	9.4375	PRIN	9	NO	STM	YES	95.87	90.13	86.95	M
N	L	4.125	9.4375	PRIN	5	NO	MTR	YES	96.83	91.45	89.12	N
O	L	4.375	7.625	PRIN	9	YES	MTR	YES	95.35	90.59	87.92	O
P	L	3.875	7.5	PRIN	9	YES	MTR	YES	95.16	90.32	87.51	P
Q	L	3.625	6.4375	PRIN	9	NO	MTR	YES	94.30	88.51	85.63	Q
R	L	4.4375	9.4375	PRIN	9	NO	MTR	YES	95.86	90.67	87.87	R
S	L	3.875	8.8125	PRIN	9	YES	STM	YES	96.17	91.56	92.04	S

\* G was retired from the set of EXFC mail piece types at the end of FY2005.

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**DBP/USPS-410.** Please refer to your response to Interrogatory DBP/USPS-53. Please clarify the meaning of "[2709" particularly with respect to the bracket.

**RESPONSE:**

The bracket constitutes a typographic error that can and should be ignored.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE  
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**DBP/USPS-411.** Please refer to your response to Interrogatory 59 subpart b.

- [a] Please confirm, or explain if you are unable to confirm, that single-piece First-Class Mail utilized by consumers also includes small parcels weighing up to 13 ounces.
- [b] Please explain why EXFC does not measure small parcels sent by First-Class Mail.

**RESPONSE:**

- a. Confirmed.
- b. See the responses to OCA/USPS-3 and 63.

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**DBP/USPS-412.** Please refer to your response to Interrogatory DBP/USPS-83.

- [a] Please explain why you believe the volume of mail that is not received is so high.
- [b] Please list and explain what you believe happened to the pieces that were not reported as being received.
- [c] Please discuss what you believe the effect is on the overall EXFC reports due to the volume of unreported mailpieces.

**RESPONSE:**

- a. The volume of mail not received is unknown as are any reasons for the consequent absence of belief. The response to DBP/USPS-83 indicates that 3.6 percent of EXFC mail pieces reported as mailed are not *reported* as received.
- b. No detailed or other study of the mail pieces that were not reported as received has been conducted. However, simple reporter nonresponse is thought to be the primary reason. Some reporters may not report every piece of mail while reporter turnover or temporary unavailability could also contribute.
- c. The overall impact on EXFC reports is negligible given the understanding that the cause is reporter nonresponse and that the proportion of nonresponse is so small. Statistical estimation best practices do not call for nonresponse adjustments or bias analyses when the response rate exceeds 95 percent.