

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 DAVID B. POPKIN  
(DBP/USPS-372, 399-402, 408)  
(August 8, 2006)

The United States Postal Service hereby provides its institutional response to interrogatories DBP/USPS-372, 399-402, 408, which were filed by Mr. Popkin on July 24, 2006, and due on August 7, 2006. A motion for late acceptance is being filed this day.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-372.** Please refer to your response to Interrogatory DBP/USPS-142 subpart d. Please advise the conditions under which the Postal Service has or will in the future allow for comments by the mailing public prior to implementing changes to the Domestic Mail Manual.

**RESPONSE:**

It is not possible for the Postal Service to provide such general advice. Every situation depends on its own facts.

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**DBP/USPS-399.** Please refer to your response to Interrogatory DBP/USPS-200 subparts g and h.

[a] Please confirm, or explain if you are unable to confirm, that the DW will be the same whether the tire [or other similar shape] is filled in or is open such as noted in the original response.

[b] Please confirm, or explain if you are unable to confirm, that the DW of a tire-shaped parcel with a diameter of 90 inches and a circumference of the cross section equal to 12 inches [the parcel would be mailable since the length plus girth would be 102 inches or less than the 108 inch limit] would be 132 pounds [90 x 90 x 4 [12 divided by pi and then rounded off] x 0.785 divided by 194].

[c] What rate would the parcel described in subpart b have if it was destined to the 8<sup>th</sup> zone? Please describe how the rate was determined.

[d] Please indicate how rates will be determined for parcels that have a DW of greater than 70 pounds.

**RESPONSE:**

[a] Confirmed.

[b] Confirmed.

[c] A parcel is unmailable as Priority Mail not only if it exceeds 108 inches in combined length and girth, but also if it weighs more than 70 pounds (DMM Section 101.3.1). If the referenced parcel is a tire, it seems improbable — with a diameter as long as Manute Bol is tall (7' 6") — that it would not weigh more than 70 pounds. However, if the parcel is not a tire but only "tire-shaped," and is composed of much lower-density material than the hard rubber typically found in tires, then please see the response to subpart [d] below.

[d] In rare cases an irregularly shaped parcel (such as a tire-shaped parcel) may (a) weigh less than or equal to 70 pounds, and (b) measure less than or equal to 108 inches in combined length and girth, yet exceed 70 pounds in dim weight. There are, of course, no Priority Mail rates beyond 70 pounds.

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**RESPONSE TO DBP/USPS - 399 (continued)**

Accordingly, the Postal Service will consider instituting a rule to charge the maximum rate — 70 pounds — if a parcel's dim weight exceeds 70 pounds and the parcel otherwise meets mailability criteria [e.g., (a) and (b) above].

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**DBP/USPS-400.** Please refer to your response to Interrogatory DBP/USPS-200 subpart i.

[a] Please confirm, or explain if you are unable to confirm, that the DW will be the same whether the tree [or other similar shape] is sent in a container with a uniform circular section with a circumference equal to the maximum of the root area of 30 inches or is open such as noted in the original response.

[b] Please confirm, or explain if you are unable to confirm, that the shipment of a conical shaped parcel would be the extreme of this condition.

[c] Please confirm or explain if you are unable to confirm, that a conical shaped parcel with a height of 40 inches and the circumference at the base of 63 inches and a circumference at the top of the cone would effectively be 0 inches would have a DW of 65 pounds.

[d] Please confirm, or explain if you are unable to confirm, that if the tree or conical shaped parcel was shipped in an open manner that other parcels could possibly extend into the open volume.

[e] Please confirm, or explain if you are unable to confirm, that irregular parcels could have a large increase in the required postage due to the imposition of the DW proposal. For example, compare the rates for a light-weight tire shaped parcel with a length plus girth of less than 84 inches. A parcel with a diameter of 71 inches and a circumference of the cross section of 12 inches and an actual weight of 3 pounds [and chargeable at this rate under the current rates since it is less than 84 inches length plus girth] would have a DW of 82 pounds.

**RESPONSE:**

[a] Confirmed.

[b] Unable to confirm. It is unclear what "condition" is being postulated.

[c] Confirmed.

[d] Confirmed.

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**RESPONSE TO DBP/USPS-400 (continued)**

[e] Unable to confirm the DW calculation of 82 pounds, but otherwise confirmed. Priority Mail dim-weighting will lead to some large postage increases, as acknowledged at USPS-T-33, page 28, line 15 (median = +72 percent). These large increases will apply to regularly shaped parcels and irregularly shaped parcels alike. If not for the proposed irregularly shaped parcel adjustment factor (0.785), the increases for irregularly shaped parcels would have been even greater.

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**DBP/USPS-401.** Please refer to your response to Interrogatory DBP/USPS-200. For each of the examples of DW that was calculated for the sample parcels in subparts a through l, please provide the calculation that would be made to show the volume of the parcel so as to determine if it exceeded the 1 cubic foot and therefore would have the DW procedure applied to it.

**RESPONSE:**

$$[a] (15'' \times 10'' \times 10'') \div 1,728 \text{ in}^3/\text{ft}^3 = 0.87 \text{ ft}^3.$$

$$[b] (15 \times 10 \times 9)/1,728 = 0.78 \text{ ft}^3.$$

$$[c] [(15 \times 10 \times 10) \times 0.785]/1,728 = 0.68 \text{ ft}^3.$$

$$[d] [(30 \times 5 \times 5) \times 0.785]/1,728 = 0.34 \text{ ft}^3.$$

$$[e] [(30 \times 10 \times 9) \times 0.785]/1,728 = 1.23 \text{ ft}^3.$$

$$[f] [(30 \times 5 \times 10) \times 0.785]/1,728 = 0.68 \text{ ft}^3.$$

$$[g] [(30 \times 6 \times 30) \times 0.785]/1,728 = 2.45 \text{ ft}^3.$$

[h] Same as subpart [g].

$$[i] [(48 \times 10 \times 10) \times 0.785]/1,728 = 2.18 \text{ ft}^3.$$

$$[j] (15 \times 8 \times 15)/1,728 = 1.04 \text{ ft}^3.$$

[k] Same as subpart [j].

$$[l] [(15 \times 10 \times 10) \times 0.785]/1,728 = 0.68 \text{ ft}^3.$$

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**DBP/USPS-402.** Please refer to your response to Interrogatory DBP/USPS-201.

[a] The original request asked for data broken out in one ounce increments [0 to 1 ounce, 1 to 2 ounces, 2 to 3 ounces, .... , 12 to 13 ounces] for weights up to 13 ounces. Please provide a revised chart showing the requested data.

[b] Please advise the weight of an empty flat rate envelope and if it is over one ounce, please explain how there could be any data in the 0 to 1 ounce category.

[c] Given that a ream of paper weighs over 5 pounds and that much paper would likely not all fit into a flat rate envelope, please discuss why the data for 6 pounds and above [some 1+ percent of the total] is reliable.

**RESPONSE:**

[a] By ounce increment, from 1 to 16 ounces (FY 2005):

1	562,668
2	12,671,214
3	10,787,634
4	7,698,410
5	6,075,401
6	5,862,635
7	4,584,658
8	4,001,984
9	3,580,551
10	3,240,122
11	2,995,226
12	2,781,804
13	2,636,702
14	2,558,843
15	2,935,504
16	2,885,750

[b] The weight of a Priority Mail flat-rate envelope, unfilled, is approximately 1.3 or 1.4 ounces. The data in subpart [a] above are based on ODIS-RPW probability-based sampling which is subject to statistical variation. As such, they are point estimates that may be more or less than the actual values, with a certain degree of probability. In addition, the 562,668 Priority Mail flat-rate

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**RESPONSE TO DBP/USPS-402 (continued)**

envelopes weighing an ounce or less (representing only 0.5 percent of all flat-rate-envelope volume in FY 2005) derive from only one or two record entries per postal quarter. Such records are not immune to data-entry or scale-calibration error, so occasional anomalous results are possible.

[c] The Priority Mail flat-rate envelope can be, and is, used for mail matter other than paper.

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**DBP/USPS-408.** Please refer to your response to Interrogatory DBP/USPS-238.

[a] Does the Postal Service believe that a 37.5% level of compliance is satisfactory.

[b] Please provide the rationale for your response to subpart a

[c] Please list and discuss the plans that the Postal Service has or will have to improve the level of compliance.

**RESPONSE:**

[a, b] The 37.5 percent is not a compliance goal but rather a modeling assumption. The Postal Service has not set goals for Priority Mail dim-weighting in the Test Year, and — at least at the present time — has no basis for affirming what would represent a satisfactory compliance result, and what would not.

[c] No such plans have yet been made, though certainly educational campaigns will be conducted. Please see witness Scherer's response to DFC/USPS-T33-2. In addition, it is possible that Canada Post and/or Australia Post will be contacted to hopefully learn more about their (successful) compliance efforts.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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August 8, 2006  
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