

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-524(b) AND 532)
(August 28, 2006)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-524(b) and 532.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

DBP/USPS-524 Please refer to your response to Interrogatory DBP/USPS-167. This follow-up Interrogatory is being filed today [since it must be filed within 7 days] without prejudice to my Motion to Compel a full response to the original Interrogatory. Your response indicates that I should refer to the response to Interrogatory DBP/USPS-127 filed in Docket R2005-1 as follows: DBP/USPS-127. Please refer to your response to DBP/USPS-88.

(a) Please confirm, or explain if you are unable to confirm, that the data provided in response to Interrogatory DBP/USPS-65 subpart d in Docket R2001-1 is still correct for the 20 referenced offices.

(b) Please provide an estimate as to the number of additional post offices that would be added to the listing if a complete study was made.

(c) Since most of the offices appear to be in Alaska, has the District Manager of the Alaska District been queried as to the offices in his District that do not have 6-day a week mail service? If not, why not? If so, what was the response?

RESPONSE:

(a) The data is still correct for 15 of the 20 offices cited. The offices of Chitina, Chignik, Chignik Lagoon, Eagle, and King Cove are currently receiving shipments of Express Mail six days per week.

(b) As noted in the response to DBP/USPS-88, a complete study would produce list that is substantially similar in both size and scope to the one provided in response to DBP/USPS-65(d) in Docket No. R2001-1. A quantitative estimate by which the number of offices on that list would increase (or decrease) cannot be provided because no complete study has been undertaken.

(c) The District Manager has been queried and responds that the service being provided is a longstanding traditional service to very unique and remote areas that are experiencing no growth whatsoever, that an appropriate level of service is being provided, and that there are no initiatives under consideration to change the present level of service.

[a] Please refer to the response to subpart c of Docket R2005-1 Interrogatory and provide a response from the District Manager of the Alaska District showing which offices in his District that do not have 6-day a week mail service. The response that was originally made did not respond to the request that was made but attempted to explain and justify why there are offices that do not have 6-day a week mail service.

[b] The response to Interrogatory DBP/USPS-380 appears to indicate that there are some instances where there are excessive distances [or lack of transportation] to meet the guaranteed delivery standards. Please explain.

RESPONSE:

(a) Objection filed.

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(b) The response to interrogatory DBP/USPS-380 discusses the setting of service standards, rather than the ability of the Postal Service to meet the standards that are set.

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DBP/USPS-532 Please refer to your response to Interrogatory DBP/USPS-289 subparts d and e. Your responses to these two subparts appear to be conflicting. Please explain why your response to subpart d states that I may direct my PO-PO Express Mail to either of the two facilities that utilize the same 5-digit ZIP Code and your response to subpart e states that I am restricted to only certain facilities that may use the same 5-digit ZIP Code.

RESPONSE:

The Postal Service assumes that this interrogatory is a follow-up to the response to DBP/USPS-281 rather than DBP/USPS-289.

The responses to parts (d) and (e) of DBP/USPS-281 do not conflict. The response to part (d) does not state, as your question asserts, that a mailer “may direct [his or her] PO-PO Express Mail to either of the two facilities that utilize the same 5-digit ZIP Code.” It instead discusses how a mailer is “advised” of the facility that a PO-PO Express Mail piece will be sent to for claim.