

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS- 525-531, 533) (August 28, 2006)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin, filed on August 14, 2006:

DBP/USPS- 525-531, 533.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999, Fax -5402
Brian.M.Reimer@usps.gov

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

DBP/USPS-525 Please refer to your response to Interrogatory DBP/USPS-399 subpart d. Please advise the wording of the rule and DMCS wording that will be adopted to indicate this change and when the filing will be amended to accomplish this change.

RESPONSE:

There has been no determination concerning the wording of any such rules, nor a determination concerning proposed changes to the DMCS, if any.

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

DBP/USPS-526 Please refer to your response to Interrogatory DBP/USPS-400 subpart e. Please explain why you were not able to confirm the DW weight of 82 pounds for the sample parcel that was referenced. My calculation would be as follows: 71 [the diameter] times 71 [the diameter] times 4 [the rounded value of 12 divided by pi] times 0.785 divided by 194.

RESPONSE:

Your calculation, as explained above (but not in DBP/USPS-400), apparently assumes a circular cross-section (where the diameter can be calculated as 3.82 inches, rounding up to 4 inches). That is not necessarily the case, and is certainly not the case for a tire, which has an irregularly shaped cross-section. Without knowledge of the shape of the cross-section, the dim weight of 82 pounds could not be confirmed.

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

DBP/USPS-527 Please refer to your response to Interrogatory DBP/USPS-401. Please confirm, or explain if you are unable to confirm, that for all shapes and sizes of parcels the determination of whether the parcel exceeds one cubic foot [so as to be subject to the DW calculation] will be accomplished by multiplying three dimensions [in inches] and then dividing by 1728 and that the DW will be calculated by multiplying the same three dimensions then multiplying by 0.785 if the parcel is not a rectangular solid and then dividing by 194.

RESPONSE:

Not confirmed, and that is not what was indicated in the response to DBP/USPS-401.

For purposes of determining dim-weight eligibility, the cubic volume of a parcel will be determined as $(L \times W \times H)/1,728$ if the parcel is regularly shaped (a “rectangular solid”), and as $[(L \times W \times H) \times 0.785]/1,728$ if the parcel is irregularly shaped (not a “rectangular solid”). The 0.785 irregularly shaped parcel adjustment factor is invoked during cubic assessment of the parcel (if irregularly shaped), not just in the dim-weight calculation as stated in your interrogatory.

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

DBP/USPS-528 Please refer to your response to Interrogatory DBP/USPS-289 subpart a. My original Interrogatory contemplated the following scenario:

1. An article was deposited in a collection box on Monday at 4 PM
2. The final collection time on the box was scheduled at 5 PM
3. The Monday collection was missed
4. The mail was collected at 5 PM on Tuesday
5. The mail was entered into the PTS on Tuesday
6. The mail from NJ to DC which is normally a 2-day standard arrived and was delivered in DC on Thursday. The PTS would show a delivery time of two days when in fact it was actually three days. Please respond to the original Interrogatory.

RESPONSE:

The original interrogatory subpart cited above, DBP/USPS-289(a), asked the Postal Service to "confirm, or explain if you are unable to confirm, that if a Priority Mail article was not collected or picked-up as scheduled it would not be reflected in the results."

The instant interrogatory does not appear to be related to DBP/USPS-289(a).

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

DBP/USPS-529 Please refer to your response to Interrogatory DBP/USPS-289 subpart e. The original Interrogatory utilized the words "may cause some mailers". Please explain why you are unable to confirm that this condition MAY cause SOME mailers to utilize Express Mail.

RESPONSE:

The Postal Service could not confirm the interrogatory as it was written. There are many reasons why mailers might choose Express Mail over Priority Mail, and the Postal Service is not clairvoyant so that it can discern whether some individual mailers have their decisions caused by mistaken understandings concerning service standards.

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

DBP/USPS-530 Please refer to your response to Interrogatory DBP/USPS-289 subpart g. Most of the Delivery Confirmation articles that I receive have an "Arrival at Unit" scan which is made at the Post Office Annex before the mail is sent up to the Main Post Office where I have my post office box. My perception is that Delivery Confirmation mail is all scanned with an Arrival at Unit scan and will have to be "held out" in an area and then each of the articles will be scanned and then forwarded on for delivery. Please respond to this scenario.

RESPONSE:

DBP/USPS-289, subpart g, asked the Postal Service to "[p]lease confirm, or explain if you are unable to confirm, that Delivery Confirmation service may actually slow up the delivery of the mailpiece since it requires that the mailpiece be held out for scanning."

The Postal Service did not confirm this interrogatory because a mailpiece is not held out for scanning. The carrier provides a scan when the piece is delivered. Your perception, as described in this interrogatory, is not correct.

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

DBP/USPS-531 Please refer to your response to Interrogatory DBP/USPS-289 subparts h and i. Which specific answers in the referenced OCA responses refer to my questions?

RESPONSE:

OCA/USPS-69 (a)-(c), 70 (d) and 71 (c). In summary, PTS is an actual piece measurement system using customer-purchased Priority Mail Delivery Confirmation at postal retail units nationwide. The sample size is large and the unique Delivery Confirmation number provides accurate acceptance and delivery dates and times, and measures the actual customer experience.

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

DBP/USPS-533 Please refer to your response to Interrogatory DBP/USPS-289 subparts b and c. Your response did not respond to the very specific questions that were posed in the original Interrogatory subparts.

RESPONSE:

The instant interrogatory does not appear to be related to DBP/USPS-289 (b) and (c), to which the Postal Service provided specific responses.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037; Fax -5402
August 28, 2006