

DOCKET SECTION

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

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OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(December 8, 1997)**

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin, dated November 20, 1997 and received by the Postal Service on November 24, 1997: DBP/USPS-94, 95, 96(b), and 97.

The interrogatories are stated verbatim and followed by the responses.


Objections to DBP/USPS-96(a) and 98 were filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN**

DBP/USPS-94

Refer to your response to subpart (f) of DBP/USPS-58. (a) Indicate the approximate percentage of letters that are sampled in this manner. (b) Confirm, or explain if you are unable to do so, that you would be able to confirm my original interrogatory if I had put the exception you related in your response into my interrogatory. (c) Approximately how many pieces of mail are checked during one of these random checks? (d) Explain any mail delays which are caused by the quality checks related in your response.

RESPONSE:

- a. The Postal Service does not have data aggregated in a manner that would permit an estimate of the percentage of letters sampled nationwide.
- b. Not confirmed. Letter carriers and box section clerks also examine letters for proper postage.
- c. The quality checks referred to in response to DBP/USPS-58(f) vary in the manner in which they are conducted locally. This makes it difficult to say *how many pieces are checked during one of these checks*.
- d. The checks are supposed to be conducted in a manner which does not delay the mail being sampled. The explanation of any particular delay would depend on the unique circumstances of any particular check which caused a delay. Beyond that, delivery of shortpaid pieces may be delayed pending collection of postage due.

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DBP/USPS-95

Refer to your response to subpart (g) of DBP/USPS-58. Approximately what percentage of the mail which meets the specifications shown will be handled by automation?

RESPONSE

For an indication of the percentage of automation-compatible letter mail which is processed on automation for the various mail processing operations, please review the mailflows depicted in the testimony of witness Hatfield, USPS-T-25.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-96

Refer to your response to subpart (p) of DBP/USPS-6. (a) Since the words "to the extent practicable" are included in the rule, why wasn't your response an unqualified yes? (b) Elaborate on the meaning of the words "to the extent practicable."

RESPONSE

- a. Objection filed.
- b. The phrase have a plain, self-evident meaning.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-97

Refer to your response to subpart (u) of DBP/USPS-6. (a) Does this mean that if there was a weather forecast predicting disruptive adverse weather conditions then the Postal Service should make the collection early? (b) Explain your response to subpart (a). (c) Out of all the collection boxes and all of the collection times for each of the boxes throughout all the country, approximately what percentage of these would have to be collected early in anticipation of disruptive adverse weather conditions? (d) Approximately what percentage would have to be collected early for any other exigent circumstances? (e) Elaborate on what might result in the early collections referred to in subpart (d). (f) Are you stating that the collection times of all boxes throughout the country should be changed to 12:01 AM so that in the event that there was exigent circumstances to collect mail early, such as in anticipation of disruptive adverse winter weather conditions, there would not be a failure for that box by collecting it early? (g) If so, explain how this would meet the conditions of the level of service contemplated by the referenced sections of the POM. (h) If not, provide a meaningful response to subparts (t) and (u) which relates to the normal conditions and not to the rare occurrence of some emergency condition.

RESPONSE:

- a. No.
- b. It means that a post office could make the collection early.
- c. The question asks what percentage "would have to be" collected early under the conditions described in part (a). In light of the response to part (b), the response to this question is none, since there is no early collection requirement under conditions described in part (a).
- d. See the response to part (c).
- e. There is no policy of mandatory early collection in anticipation of exigent circumstances. Therefore, it is impossible to elaborate on "what might result in the non-existent mandatory early collections referred to in subpart (d).
- f. No.

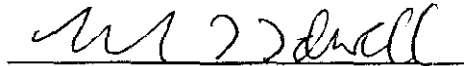
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Response to DBP/USPS-97 (continued)

- g. N/A
- h. See T&U

CERTIFICATE OF SERVICE

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

A handwritten signature in cursive script, appearing to read "M. Tidwell", written over a horizontal line.

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