

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

SIX-DAY TO FIVE-DAY STREET DELIVERY
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 26]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. To the extent that a reference is made in the response to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

April 13, 2010

Respectfully submitted,

N20101A1

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-1 [a] Please confirm, or explain if you are unable to confirm, that the mail which is placed in a post office box on Saturday under the proposed plan will be identical in makeup to that which presently exists. For example, mail posted on Friday to a post office box customer in the overnight service standard area, in the two-day service standard area on Thursday, and in the three-day service standard area on Wednesday will all be delivered on Saturday. Furthermore, it will apply to all categories of mail such as DPS mail, non-DPS mail, Priority Mail, Express Mail, parcels, standard mail, accountable mail, etc.

[b] Please confirm that all postal facilities that have post office box mail service on a weekday will have full post office box mail service on a Saturday and that there will be access to the box for at least 30 minutes after the "box up time"

[c] If not, please explain and advise the number and reason of the facilities that do not have this level of service.

DBP/USPS-2 [a] Please advise whether the "box up time" for post office box customers is expected to change or remain the same under the proposed plan, particularly on Saturdays and Mondays. Please explain the reasons for your response.

[b] What is the current policy including manual citation as to whether the "box up time" should be uniform throughout an entire district as opposed separate times for each facility based on the needs of that facility? Please explain the reasons for your response.

DBP/USPS-3 [a] Please explain how DPS mail is presently sorted to both sequence post office box mail vs. carrier delivery mail. Please indicate the "condition" or status of the mail that exists after each pass.

[b] Please provide the same information requested in subpart [a] for the proposed plan.

[c] Once the post office box mail has been fully sequenced, in what condition will the carrier delivery mail be?

[d] What further steps, if any, will be required to place Saturday's carrier delivery mail in proper sequence for delivery on Monday?

DBP/USPS 4 What are the normal number and maximum number of bundles that a delivery carrier will utilize under the present system and what will it be under the proposed plan? Please describe the content of each of the bundles.

DBP/USPS-5 [a] What types of mail are processed on DPS?

[b] What percentage of the mail of each type is presently processed as DPS mail?

[c] What are the goals for the future?

DBP/USPS-6 Please describe the processing that will be necessary to obtain all of the non-DPS mail that is destined for Saturday post office box delivery and how this mail will be separated from the carrier delivery route mail that would have been delivered on Saturday under the present system but will now be delivered on Monday under the proposed plan? Will that carrier delivery mail be processed on Saturday or Monday?

DBP/USPS-7 [a] Has any consideration been given to establishing unique 5-digit ZIP Codes for segregating post office box mail delivery vs carrier route delivery mail?

[b] Please describe the effect such a change of address would have on existing post office box customers.

[c] Please fully explain your response.

DBP/USPS-8 Please confirm, or explain if you are unable to confirm, that the proposed plan will now place a greater significance on the level of Friday's retail window service and final collection and dispatch times than presently exists [this would be due to the loss of mail processing on Saturday causing the mail to be delayed until Monday].

DBP/USPS-9 [a] Please advise the level of service that the Postal Service plans to provide for each of the federally observed holidays should that holiday fall on a Friday, Saturday, Sunday, or Monday.

[b] Please advise the level of service that the Postal Service plans to provide on days that are not the actual holiday but are associated with a nearby holiday, such as Christmas Eve, New Year's Eve, Thanksgiving Friday and/or Saturday, a long holiday weekend, etc.

[c] To what extent does the Postal Service celebrate and reduce the level of service for a non-federally observed holiday such as Good Friday in the Caribbean District?

DBP/USPS-10 [a] For each of the 70-some odd postal districts in the country, please advise the percentage of the facilities that have retail window service on Saturday. Please provide a separate percentage considering main offices only and a second percentage for all facilities including stations and branches.

[b] Please advise the current policy including any manual citation on whether a given facility may or must have Saturday window hours and if so, the minimum number of hours of service.

[c] Please advise the current policy including any manual citation on the minimum number of hours of retail window service on a weekday.

DBP/USPS-11 Please confirm, or explain if you are unable to confirm, that all post office boxholders will have the ability to interact with a postal employee six days a week for at least 30 minutes after the "box up time" for the purpose of picking up an article that will not fit in the box or accountable mail. This interaction should be a public arrangement as opposed to an informal arrangement.

DBP/USPS-12 Please confirm, or explain if you are unable to confirm, that all post offices that have a delivery service will have a formal means on Saturday for delivery customers to claim mail for which a claim notice was left during the week.

DBP/USPS-13 [a] Please confirm, or explain if you are unable to confirm, that all post offices providing retail window service on Saturdays will accept Express Mail.

[b] Please confirm, or explain if you are unable to confirm, that exclusive Express Mail blue collection boxes will be collected on Saturday unless the box is not accessible.

[c] Will Saturday collections be made for Express Mail deposited in an Automated Postal Center [APC]?

[d] If not, why not?

[e] Please advise any other means that customers will have to originate Express Mail on a Saturday.

[f] Please confirm, or explain if you are unable to confirm, that all Express Mail originated on a Saturday as indicated in subparts [a], [b], [c], and [e] above will be dispatched on Saturday and achieve delivery starting on Sunday.

[g] Please confirm, or explain if you are unable to confirm, that Express Mail requires an acceptance employee to process and endorse all outgoing Express Mail.

[h] Will this acceptance be performed at the local office?

[i] If not, where will it be performed and will this employee have knowledge of the induction time of the mailpiece so as to make the proper entry and provide the correct guarantee delivery time?

[j] If not, why not?

DBP/USPS-14 [a] Please advise the number of blue Express Mail collection boxes that are in service at locations at a post office.

[b] How many of these boxes do not have a collection made on Saturday?

[c] Please explain the reason[s] why the boxes noted in subpart [b] do not have a collection on Saturday.

[d] Please advise the number of blue Express Mail collection boxes that are in service at locations at other than at a post office.

[e] How many of these boxes do not have a collection made on Saturday?

[f] Please explain the reason[s] why the boxes noted in subpart [e] do not have a collection on Saturday.

DBP/USPS-15 [a] Please advise the number of Automated Postal Centers [APC] that are in service at locations at a post office.

[b] How many of these APCs do not have a collection made on Saturday?

[c] Please explain the reason[s] why the APCs noted in subpart [b] do not have a collection on Saturday.

[d] Please advise the number of APCs that are in service at locations at other than at a post office.

[e] How many of these APCs do not have a collection made on Saturday?

[f] Please explain the reason[s] why the APCs noted in subpart [e] do not have a collection on Saturday.

DBP/USPS-16 [a] Please confirm, or explain if you are unable to confirm, that the Postal Service presently has a \$12.50 additional charge for Express Mail scheduled for a Sunday or holiday delivery.

[b] Is it proposed to also apply an additional charge for Express Mail which is scheduled for Saturday delivery at a location other than a post office box or Hold for Pickup at a post office?

[c] If the response to subpart [b] is yes, will it be the same charge as will exist for Sunday/holiday delivery and if so, what are the reason[s] for not having a reduced charge on Saturday?

[d] Is it proposed to also apply an additional charge for Express Mail which is scheduled for Saturday delivery at a post office box or Hold for Pickup at a post office?

[e] If the response to subpart [d] is yes, what are the reason[s] for imposing this charge?

DBP/USPS-17 [a] Please confirm, or explain if you are unable to confirm, that the Postal Service has two lists related to Sunday and holiday delivery of Express Mail. One list shows those ZIP Codes to which physical delivery will be made to a street address location and the second list shows those ZIP Codes to which delivery will be made to a post office box.

[b] For those ZIP Codes listed in the first list, will delivery be attempted at all addresses utilizing that ZIP Code other than post office boxes, in particular at rural and /or HCR delivery addresses that may be located some distance from the post office?

[c] For those ZIP Codes listed in the second list, will delivery be possible if the post office box customer must sign for the mail and if so, how will this be accomplished?

[d] If an Express Mail article is guaranteed for Sunday or holiday delivery and the customer paid both the basic Express Mail postage and the Sunday/holiday delivery fee and delivery is not made by the guaranteed time, will the sender be able to have the total postage refunded?

[e] If not, why not?

[f] Please confirm, or explain if you are unable to confirm, that in order to determine whether an article can be guaranteed for Sunday/holiday delivery there must be transportation to the 3-digit ZIP Code area and then the specific 5-digit ZIP Code must be on the appropriate list.

[g] As a result of the proposal made in this Docket, are there any changes contemplated for the Sunday/holiday Express Mail listings and if so, what are they?

DBP/USPS-18 [a] Will there be a listing of those ZIP Codes for which Saturday delivery of Express Mail can be achieved for mail addressed to a street address?

[b] If not, why not? If so, what will the relationship to the similar Sunday/holiday listing?

[c] Will there be a listing of those ZIP Codes for which Saturday delivery of Express Mail can be achieved for mail addressed to a post office box or Hold for Pickup?

[d] If not, why not? If so, what will the relationship to the similar Sunday/holiday listing?

[e] What will the relationship between the guaranteed time of delivery on Saturday of Express Mail addressed to a post office box or Hold for Pickup mail and the accessibility to the box to claim the article that has a waiver of signature and an accessibility to an employee if it is necessary to sign for the mail and/or the article is too large for the box and/or it is being held for pickup? In other words, is there a realistic delivery of Express Mail on a Saturday to a post office box holder and/or a Hold for Pickup recipient?

[f] Will the originator of the Express Mail be able to determine at the time of mailing from the originating post office what the guaranteed time of delivery is and what the accessibility will be at the delivery office so as to determine the likelihood of a successful delivery?

[g] If not, why not?

[h] Will it constitute a valid delivery of an Express Mail article for purposes of meeting the guarantee if the notice of delivery is placed in a post office box prior to the guaranteed delivery time but the box holder does not have access to the box and/or the postal employee to claim the article?

[i] If so, please explain the rationale for that policy.

[j] Will it constitute a valid delivery of an Express Mail article for purposes of meeting the guarantee if a Hold for Pickup article arrives in a post office prior to the guaranteed delivery time but the recipient does not have access to the postal employee to claim the article?

[k] If so, please explain the rationale for that policy.

DBP/USPS-19 [a] Please confirm, or explain if you are unable to confirm, that for most places in the country there are two different overnight Express Mail service areas - one where the mail is processed on the FedEx network and the other which is limited to nearby areas only since the FedEx network is not operating.

[b] Please describe the processing of Express Mail that utilizes the FedEx network including the method of processing for an article currently mailed on a Saturday in order to achieve Monday delivery.

[c] Please indicate the days on which the FedEx network will not be in service and overnight Express Mail will be limited to nearby areas rather than the "full network", such as Saturday acceptance for delivery on Sunday.

[d] Please provide a schedule of the FedEx network both for a normal week as well as on and around holidays.

[e] Please respond to subparts [a] through [d] as proposed under the pending Docket.

DBP/USPS-20 Please confirm, or explain if you are unable to confirm, that just as mail now travels on Sunday under the proposed Docket mail will travel on Saturday and Sunday. In other words, First-Class Mail that enters the system on Friday will be delivered on Monday except for those few areas that have 4-day or 5-day standards and for mail addressed to a post office box in an overnight area which will be delivered on Saturday.

DBP/USPS-21 [a] Please confirm, or explain if you are unable to confirm, that the Postal Service is proposing to eliminate outgoing mail processing [except for

Express Mail] on Saturday which includes the collection of mail from delivery customer locations, blue collection boxes, and post offices; the local preparation of the mail; transportation to the plant, and mail processing at the plant.

[b] Please advise any other activities that are related to the elimination of outgoing mail processing on Saturday.

[c] What is the total annual savings for this entire function?

[d] Provide a breakdown of the separate functions that combine to the total provided in response to subpart [c].

[e] What is the total annual cost for providing all of the above related functions for the processing of outgoing Express Mail on Saturday?

[f] Provide a breakdown of the separate functions that combine to the total provided in response to subpart [e].

[g] What would the added annual cost be to make a normal Saturday collection from blue collection boxes?

[h] What would the added annual cost be to make a Saturday collection from the blue collection boxes located in front of postal facilities?

[i] What would the added annual cost be to make a Saturday collection from the blue collection boxes located in front of main office only postal facilities?

[j] What would the added annual cost be to make a Saturday collection from the lobby drops located in postal facilities?

[k] What would the added annual cost be for local preparation of the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?

[l] What would the added annual cost be for the transportation to the plant of the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?

[m] What would the added annual cost be for the operation of the plant to process the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?

[n] What would the added annual cost be for any added costs that are necessary on Sunday or Monday due to the failure to complete certain actions on Saturday, for

example, presently some offices will make an early morning collection on the Tuesday following a Monday holiday? Please enumerate what these added costs would be caused by and the individual costs.

[o] Please provide, in detail, how each of the cost figures above was calculated.

DBP/USPS-22 [a] Please provide a listing of those plants that presently consolidate their Saturday processing to another plant.

[b] Please discuss the items that are considered before making a Saturday only consolidation.

[c] What internal and external notifications or approvals are necessary to establish a Saturday only consolidation?

[d] Please provide a listing of those plants that are under consideration for a Saturday only consolidation. Please show the current status and potential annual cost savings.

DBP/USPS-23 [a] Please confirm, or explain if you are unable to confirm, that current Postal Service policy mandates that collections made from the blue collection boxes shall be as late as possible consistent with the available transportation.

[b] Please advise what the current Postal Service policy is for the maximum time that should elapse between the final collection time as shown on the blue collection box in front of the post office and the departure of the transportation from that office to the plant. Please provide any manual citations.

DBP/USPS-24 [a] Please confirm, or explain if you are unable to confirm, that the Postal Service provides three types of carrier delivery service, namely, city delivery, rural, and HCR.

[b] Please confirm, or explain if you are unable to confirm, that these carriers depart from a post office with mail of all types which they deliver along their routes, pick up outgoing mail and other requests from customers along their routes, and return to their office where they clear their routes and then leave.

[c] Please provide a listing of all of the functions that are associated with the clearing of their routes upon return to the office at the end of the day. If necessary, indicate which of the three types of carrier routes the function applies to.

[d] Please advise which of the functions can be completed by the carrier without assistance and which of the functions require the assistance of another individual on duty at the facility.

[e] Please provide the best estimate of the earliest time that approximately 90% of the carriers will return to the facility after completing the delivery on their route. To put it in another way, approximately 90% of the carriers will not return to their facility until on or after the time specified.

DBP/USPS-25 Please provide a listing of the city delivery post offices that have been granted a waiver of the requirement to have a weekday collection time at the blue collection box in front of the post office and all classified stations and branches of 5 PM or later and/or a Saturday collection time of 1 PM or later. The response should indicate the name and ZIP Code of the post office and the current time of the collection.

DBP/USPS-26 [a] How many post offices in the country have city delivery service?

[b] What percentage of these city delivery offices have a weekday collection time at the blue collection box in front of the main post office and all classified stations and branches of 5 PM or later?

[c] What percentage of these city delivery offices have a Saturday collection time at the blue collection box in front of the main post office and all classified stations and branches of 1 PM or later?

[d] If the response to subparts [b] and [c] is less than 100%, please provide the reasons for not providing the minimum level of service indicated in the Postal Operations Manual.