

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-38-43)  
(May 21, 2010)

The United States Postal Service hereby responds to the following  
interrogatories of David B. Popkin, filed on May 7, 2010:

DBP/USPS-38 through 43.

Each interrogatory is reprinted below, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Pricing and Product Support

Brian Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -5492

Docket No. N2010-1

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

**DBP/USPS-38** Please refer to your response to Interrogatory DBP/USPS-7 subparts [b] and [c].

[a] Please advise why the 8th word in your response is "could" rather than "would".

[b] Under what conditions would a box holder not have to notify their correspondents?

[c] To what extent does the Postal Service take into account the burden and cost placed on box holders whose address is changed by the Postal Service.

**RESPONSE**

(a-c) Postal regulations need not specify conditions under which addressees must inform their correspondents of a change in address. Hence, the response allows for the fact that notification is a customer choice. Addressees might choose not to notify others if (1) a forwarding order was deemed sufficient, (2) the new address needed to remain private information, (3) both new and old addresses remained valid, or (4) any other reason. The Postal Service recognizes that most people prefer that address changes be a customer choice, rather than imposed for some external reason. Accordingly, the Postal Service mitigates potential burdens and costs on customers when it requires Post Office box address changes by minimizing such occurrences, facilitating forwarding to new addresses and notifying mailers of address changes.

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**DBP/USPS-39** Please refer to your response to Interrogatory DBP/USPS-9.

[a] Please confirm that a holiday falling on a Saturday will be celebrated Friday.

[b] Please confirm that this is a change in the current policy.

[c] Please explain why this change was implemented.

[d] Please refer to your response to subpart [b] in which you indicate that customers will be provided with notice of the reduced level of service. Please advise the methods of notification that will be provided.

[e] For any blue collection boxes which will be collected prior to the existing posted time, will notice be placed on the box itself in a manner similar to the FedEx boxes located at a post office?

[f] If not, why not?

[g] Please refer to your response to subpart [c] with respect holidays celebrated in Puerto Rico. Are any of these holidays celebrated in the US Virgin Islands?

[h] Please describe the notification that is provided to advise customers of the reduced level of service?

[i] For any blue collection boxes which either will not be collected that day or will be collected prior to the existing posted time, will notice be placed on the box itself in a manner similar to the FedEx boxes located at a post office?

[j] If not, why not?

**RESPONSE**

[a] The issues raised in this interrogatory concern matters that have been bargained for between the Postal Service and unions representing its employees. The Postal Service's expectation is that a holiday falling on a Saturday will be celebrated on Saturday for Post Offices, meaning that they will be closed on the holiday. There will be no window service nor delivery to Post Office Boxes on a holiday Saturday. The holiday will be celebrated for delivery on Friday, meaning there will be no delivery to street addresses on the Friday before a holiday falling on a Saturday.

[b] This would not be a change from current policy of celebrating a holiday that falls on the non-operating day on the preceding or following operating day. In five-day operations, Saturday will be an operating day for Post Offices, but will not be an

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**RESPONSE to DBP/USPS-39 (continued)**

operating day for delivery to street addresses. If Saturday is a holiday, the current policy will be used and Post Offices will be closed on Saturday and no deliveries will be made on Friday.

[c] Not applicable.

[d] All offices are required to post notices at facilities of holiday closings and reduced service levels. Many offices also post notices in local newspapers and community bulletins, as well as public service notices on local radio stations.

[e] Notices are not posted on the box for early or overflow collections.

[f] Early or overflow collection decisions are made locally, and often on the same day that such collections are made. The normal collection must also be made at the posted time on the box.

[g] Puerto Rican Commonwealth holidays are not observed in the Virgin Islands.

[h] Notices are posted at the postal facilities involved.

[i] Such notices are not posted on individual collection boxes.

[j] Such reduced service is in response to long established local customs and meets local customer expectations for that date.

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**DBP/USPS-40** Please refer to your response to Interrogatory DBP/USPS-14.

[a] Is it the intention that all Express Mail boxes that are accessible to the public will have a Saturday collection?

[b] If not, why not? If so, by when will it be accomplished?

**RESPONSE:**

[a] It is planned that all accessible Express Mail boxes be picked up on Saturday.

[b] N/A

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**DBP/USPS-41** Please refer to your response to Interrogatory DBP/USPS- 15.

[a] Is it the intention that all APCs will have a Saturday collection?

[b] If not, why not? If so, by when will it be accomplished?

**RESPONSE:**

[a] No.

[b] It is not always necessary to have a Saturday collection. Mail inducted via an APC on Saturday will be collected and dispatched on Monday, with the exception of Express Mail which will be dispatched on Saturday.

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**DBP/USPS-42** Please refer to your response to Interrogatory DBP/USPS-17 subpart [c].

[a] Please confirm, or explain if you are unable to confirm that the only way that post office box holders that are at ZIP Codes that are on the second list referred to in the response to subpart [a] of DBP/USPS-17 will be able to obtain Sunday or holiday delivery of their Express Mail will be if it is during hours of retail operation.

[b] Please confirm, or explain if you are unable to confirm that all post offices that are at ZIP Codes that are on the second list referred to in the response to subpart [a] of DBP/USPS-17 have Sunday or holiday hours of retail operation to allow for the delivery of Express Mail on Sundays or holidays.

**RESPONSE:**

[a] Sunday or holiday retail hours are not required for PO Box delivery to ZIP codes eligible for Sunday and/or holiday Express Mail delivery. The proposed plan does not include any changes to the way Express Mail is delivered on Sundays or holidays to Post Office Box holders.

[b] Sunday or holiday retail hours are not in place at all locations eligible for Express Mail delivery to PO Boxes on Sunday and/or a holiday. The proposed plan does not include any changes to the way Express Mail is delivered on Sundays or holidays to Post Office Box holders.

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**DBP/USPS-43** Please refer to your response to Interrogatory DBP/USPS- 28.

[a] Under the proposed procedure if a First-Class Mail letter is mailed on a Friday before a Monday holiday in Englewood NJ 07631 to a street address in Paramus NJ 07652 it will have a delivery expectation of the following Tuesday - four calendar days later even though it would still be the next delivery day. How many days will that letter count towards reporting the days to delivery category? Please explain your answer.

[b] Please advise the data that is tabulated for the service performance of First-Class Mail and provide copies of the directives and manuals that support the collection and reporting of the data in the various reports.

**RESPONSE:**

(a) This subpart of the interrogatory contains the following question:

How many days will that letter count towards reporting the days to delivery category?

It is not clear what that question is asking. However, this subpart appears to assume the future implementation of 5-day delivery to street addresses and describes a future scenario where a letter with a one-day service standard would be recorded, for service measurement purposes, as having been delivered within the applicable service standard on the next delivery day after entry. It is not clear what requires explanation.

(b) This subpart seems to request access to materials previously filed at the Commission. See United States Postal Service FY 2009 Annual Compliance Report (December 29, 2009). See also, Docket No. PI2008-1, *USPS Service Performance Measurement* Attachment to PRC Order No. 48 (December 4, 2007). See also, Docket No. R2000-1, USPS Library Reference I-236. Also, be advised that pending rulemaking Docket No. RM2009-11 is expected to clarify what the Postal Service will be required to report regarding service performance in the future.