

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-45-55)
(June 8, 2010)

The United States Postal Service hereby responds to the following
interrogatories of David B. Popkin, filed on May 24, 2010:

DBP/USPS-45-55

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-45 Please refer to your response to Interrogatory DFC/USPS-16 in this Docket dated April 26, 2010 and the response to Interrogatory DBP/USPS-46 in Docket N2009-1 dated October 13, 2009.

[a] Please confirm, or explain if you are unable to confirm, that these two responses were made to the same question or scenario and therefore represent a change in policy over the six plus months between the two responses.

[b] Please confirm, or explain if you are unable to confirm, that there are now two additional conditions which may prevent mail which a carrier collects from customers along their delivery route from being dispatched to the processing facility for processing on the day of collection, namely, excessive distance from the plant and transportation schedules.

[c] Please confirm, or explain if you are unable to confirm, that the distance that a post office is from the plant is a foreseen circumstance.

[d] Please confirm, or explain if you are unable to confirm, that transportation schedules are a foreseen circumstance.

[e] Please advise the minimum distance that would have to exist between the post office and the processing plant before it could be considered to be excessive.

[f] What level of management will make the decision that a post office is an excessive distance from its processing plant?

[g] What other criteria are considered in making the decision that a post office is an excessive distance from its processing plant?

[h] Please confirm, or explain if you are unable to confirm, that whenever possible transportation schedules should be made to allow for meeting processing criteria.

[i] Please confirm, or explain if you are unable to confirm, that post offices should make the best use of their existing transportation.

[j] Other than a transportation schedule being set up which must leave early because of an excessive distance from the processing plant, please advise the scenarios under which transportation schedules will keep mail from being processed on the day of collection.

[k] Please advise the reasons why this change in policy was made.

[l] Please confirm, or explain if you are unable to confirm, that there are some post offices whose final dispatch is such that there are some days where collected mail will not

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

be dispatched on the day of collection due to a late return of the carrier as a result of a circumstance such as a delayed start, mail volume, pivoted routes due to absences, etc.

[m] Please confirm, or explain if you are unable to confirm, that customers who give their carriers mail for dispatch have an expectation that it will be dispatched the same day.

[n] Please advise the method by which delivery customers are made aware that mail which they give to their carrier for dispatch will not be processed on the same day.

[o] Approximately what percentage of the post offices in the country that have delivery service utilize the excessive distance to the plant and/or transportation schedules "exception" to not provide consistent same day dispatch of carrier collected mail?

RESPONSE:

[a]-[b] Not confirmed. The two questions posed similar scenarios. The responses are not inconsistent with each other. The response to DFC/USPS-16 in this docket might be more complete, as it mentions excessive distance from the plant and transportation schedules, whereas the response to DBP/USPS-36 from Docket No. N2009-1 did not. There has been no change in postal policy.

[c]-[d] Confirmed.

[e]-[g] There is no defined "minimum distance," nor are there regulations that address when this situation occurs.

[h]-[i] Confirmed.

[j] When distance from the plant is not at issue, transportation schedules should not keep mail from being processed on the day of collection.

[k] There has been no change in postal policy.

[l] All available collection mail is dispatched. Of course, mail that is not available at the time of the final dispatch cannot be dispatched at that time.

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

[m] While one might expect that customers who give their carriers mail for dispatch have an expectation that it will be dispatched on the same day, no study has been conducted of this matter.

[n] There is no such method.

[o] There are no available data to answer this question.

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

DBP/USPS-46 Please refer to your response to Interrogatory DBP/USPS-24 subparts [c] and [d].

[a] Please confirm, or explain if you are unable to confirm, that rural delivery carriers act as a "miniature post office on wheels" and provide many services to their customers such as sale of stamps, purchase of money orders, processing [including the determination of the proper postage] of all classes of single-piece mail, acceptance of money for these services, return of the service and/or change the following day.

[b] Please confirm, or explain if you are unable to confirm, that city delivery carriers only deliver all classes of mail and pick-up only fully prepaid single-piece mail.

[c] Please advise whether Contract Delivery Service carriers provide any of these services that are provided by a rural delivery carrier or are they limited to the same services of a city delivery carrier.

RESPONSE:

[a] Rural Carriers and Contract Delivery Carriers can provide most postal services to the customers, and most transactions do not require meeting a carrier at the mailbox.

The most frequently used services are:

- Mailing Packages (Prepaid and needing postage affixed)
- Sale of stamps
- Purchasing Stamps by Mail
- Purchasing Postal Money Orders
- Special Services such as Certified, Registered, Express Mail, Delivery Confirmation, Signature Confirmation and COD.
- Vacation Hold Mail Service

[b] Confirmed.

[c] Contract Delivery Service carriers (CDS) are not necessarily limited in the services they may provide for their customers, dependant on their contractual agreement.

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

DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-24 subparts [c], [d], and [e]. Please also refer to your response to Interrogatory DFC/USPS-16 in this Docket dated April 26, 2010 and the response to Interrogatory DBP/USPS-46 in Docket N2009-1 dated October 13, 2009.

[a] Please confirm, or explain if you are unable to confirm, that if a post office is to provide same day dispatch to the processing plant of mail collected by the various delivery carriers, there must be a trip to the processing plant that departs after the return of the delivery carriers.

[b] Please confirm, or explain if you are unable to confirm, that if there is such a trip to the processing plant as referred to in subpart [a], mail which is deposited in the lobby drop and/or the blue collection box outside the post office can be included with the mail that the delivery carriers return with from their routes for dispatch to the plant that day.

[c] Please advise why the mail which is deposited in the lobby drop and/or the blue collection box outside the post office cannot be collected by the clearance clerk on duty at the facility or by another employee on duty at the same time.

[d] Please advise why the mail which is deposited in the lobby drop and/or the blue collection box outside the post office cannot be collected by a returning delivery carrier.

[e] Please confirm, or explain if you are unable to confirm, that if this later collection is made by the clearance clerk and/or other employee on duty and/or returning delivery carrier that the time associated with this later collection should be shown on the collection label.

RESPONSE:

[a]-[b] Confirmed.

[c] It is not that this mail "cannot be collected." It may not, however, be feasible to require it be collected at that time. Clerical employees not working the window have multiple functions, including carrier clearance, assisting in lobby sweeps, handling non-revenue transactions at a dutch door, distributing mail, handling undeliverable or return mail, and answering customer inquiries and the phone.

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

[d] Operations at every post office vary based on customer base, customer expectations, staffing, etc. Volumes at collection boxes at facilities are generally too heavy to allow a carrier returning from his or her route the capability or proper tools to empty the box, especially if the boxes are jumbo or high density boxes.

[e] Any scheduled collections made from a collection point should be recorded in CPMS, posted on the box itself, and scanned by the collecting employee.

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

DBP/USPS-48 Please refer to your response to Interrogatory DBP/USPS-26 subpart [b]

[a] Please clarify the last three words of your response. Does the "based on transportation" apply to the 5 PM collection as well as any that are later or does it only apply to those that are later?

[b] Please advise those conditions under which the final weekday collection can be earlier than 5 PM.

RESPONSE:

[a] It applies to all collections.

[b] There are offices where, due to the time required to pull and consolidate the mail, travel to the plant, and cancel it in the plant in a timely manner, it is necessary that the last collection be made prior to 5:00 pm.

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

DBP/USPS-49 Please refer to your response to Interrogatory DBP/USPS-30 subpart [d]. Please advise the best estimate of the CPU locations that have retail hours on Friday that are after the final dispatch.

RESPONSE:

A “best estimate” of CPU locations with retail hours after Friday’s final dispatch is about 50%. One purpose of Contract Postal Units (CPUs) is to offer the general public alternate access to Postal Services after normal business hours, in places where they live, work and shop.

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

DBP/USPS-50 Please refer to your response to Interrogatory DBP/USPS-32 subpart [c]. Please explain why you consider a mid-morning dispatch to be characterized as an evening dispatch.

RESPONSE:

“Evening dispatch” is not a postal term. As stated in the response to DBP/USPS-32 part c, “Some facilities have limited retail services only, which could make the final dispatch as early as mid-morning. The last dispatch of the day that will carry committed mail is based on a number of factors including operational needs and distance to host plant.

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

DBP/USPS-51 Please refer to your response to Interrogatory DBP/USPS-34 subpart [b]. Please confirm, or explain if you are unable to confirm, that the Postal Service can eliminate post office box delivery on Saturday at any facility that it unilaterally believes that customers do not have a need for the service.

RESPONSE:

Current PO Box service levels will not change as a result of this proposal. However, as stated in the response to DBP/USPS-34 part c, "As has always been the case, the number of locations that do not receive Saturday PO Box services may change based on operational needs."

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

DBP/USPS-52 Please refer to your response to Interrogatory DBP/USPS-41.

[a] Will the mail that has accumulated in the intake container of all APCs be evaluated each Saturday so that all Express Mail can be removed and dispatched on Saturday?

[b] If not, why not?

[c] If so, how will the mailing public be aware of the time of the last collection?

[d] Can all Express Mail, regardless of the method by which it is prepared and postage paid, be deposited in the APC?

[e] If not, why not?

RESPONSE:

[a] Express Mail will be extracted from APC drop locations on Saturday.

[b] Not applicable.

[c] Signage will be created to make the mailing public aware of this time.

[d] No.

[e] Per the DMM section 1.1 part a:

1.1 Deposit of Next Day and Second Day Delivery

Express Mail Next Day and Second Day Delivery items:

a. Express Mail weighing more than 13 ounces bearing only postage stamps as postage may not be deposited into a collection box, Postal Service lobby drop, Automated Postal Center (APC) drop, Postal Service dock, customer mailbox, or other unattended location. These mailpieces are also precluded from pickup service. The sender must present such items to an employee at a retail service counter in a Postal Service facility. Improperly presented items will be returned to the sender for proper entry and acceptance. The "time and date of mailing" for these items is the time and date when the items are presented and accepted.

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

DBP/USPS-53 Please refer to your response to Interrogatory DBP/USPS-39 subparts [e] and [f].

The original interrogatory was not intended to refer to overflow or additional collections but to those instances where the final collection time was made early and not made as posted. For example, a box with a posted final collection time of 5 PM is only collected at 12 Noon as has occurred in the past on days near a holiday.

[a] For any blue collection boxes which will have a final collection made prior to the existed posted time, such as occurred in the past on days surrounding holidays, have a notice placed on the box itself in a manner similar to the FedEx boxes located at a post office?

[b] If not, why not?

[c] Please refer to the second sentence in response to subpart f of the original interrogatory. Please confirm, or explain if you are unable to confirm, that it is the intention of the Postal Service to make all posted collections including on days around holidays which in the past have had final collection times advanced.

RESPONSE:

[a] Notices are not generally placed on the boxes.

[b] The directions provided to the field for December 23 and 30, 2009 were as follows:

“All collection points with a scheduled last collection after 12:00 noon on December 24 and 31 will be advanced to 12:00 noon, except for the lobby drops and collection boxes outside post offices that maintain normal hours on these dates. Information about the early collections, and locations where mail can be deposited after 12:00 noon on these dates, should be included in the customer signs and media information described below.

To provide awareness for customers and the community about the early closing for most post offices, the early collection schedule, and post office locations where retail service and later collections will be available on these dates, each office must post signs to notify customers no later than December 8. The signs must be placed at the customer entrance area for the retail lobby, in the retail lobby itself, other public lobbies (such as the P.O. Box lobby), and affected Business Mail Entry Units. The signs should advise customers of the early

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

closing time for that post office, and information about post offices open after 12:00 noon on December 23 and 30. Templates for these signs are available from the Manager, Retail at the district.

Information about the early closing, and the locations and closing times for post offices open after 12:00 PM (noon) on December 23 and 30, should also be provided to local media resources. Include a request that the local media provide this information for the public as a public service announcement, and broadcast the information as often as necessary to help with public awareness of the early closing, the early collection schedule, and post office locations and hours for those post offices open after 12:00 noon on December 23 and 30.”

[c] The referenced statement refers to overflow collections.

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

DBP/USPS-54 Please refer to your response to Interrogatory DBP/USPS-39 subparts [g] through [j].

[a] Please confirm your response to subpart [g] as well as the original interrogatory DBP/USPS-9 subpart [c] as I have received information that post offices in the US Virgin Islands celebrate four local holidays in addition to the ten federal holidays.

[b] Since tourism is a major activity in the area, please advise how tourists will be aware of the long established local customs.

[c] Do the notices posted as indicated in response to subpart [h] contain an indication that the collection service will be affected?

[d] If not, why not?

RESPONSE:

[a] Each island in the Virgin Islands celebrate three local holidays: Three Kings Day, Good Friday and Carnival. Depending on the island, Carnival may fall either in January or in late April/early May.

[b] Beginning one week prior to the holiday, local media announce the upcoming holiday using postal generated announcements. These are made on radio and in the local papers. Lobby notices are also posted.

[c] These notices indicate that collection service is affected by the local holiday.

[d] Not Applicable

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

DBP/USPS-55 Please refer to your response to Interrogatory DBP/USPS-39 subparts [a] through [c].

[a] Please confirm, or explain if you are unable to confirm, that Independence Day 2009 [July 4, 2009] fell on a Saturday.

[b] Please confirm, or explain if you are unable to confirm, that normal delivery was made on Friday, July 3, 2009.

[c] In light of your responses to subparts [a] and [b] above, please respond, if necessary, to subparts [a] through [c] of interrogatory DBP/USPS-39.

RESPONSE:

[a] Confirmed.

[b] Normal delivery service was provided on Friday, July 3.

[c] No change in that response is necessary.