

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN  
(DBP/USPS-1 THROUGH 17 AND 19 THROUGH 21)

The United States Postal Service hereby files the response to the following interrogatory of David B. Popkin: DBP/USPS-1 through 17 and 19 through 21, filed on May 4, 2006. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 18, 2006

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

**DBP/USPS-1** Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail, please list the maximum and/or minimum size, weight, shape, or other characteristics that will determine whether the article is mailable or not.

**RESPONSE**

The First-Class Mail maximum and/or minimum size, weight, shape, and characteristics that make it mailable or not are outlined in the *Mailing Standards of the United States Postal Service* (Domestic Mail Manual 1-8-06) in the following DMM sections:

**dimensions, 601.1.2, 601.1.3**

discount flats, 301

discount letters, 201

discount parcels, 401

retail mail, 101

**nonmailable matter**

animals and plants, 601.8.7

due to noxious odors, 601.11.8

due to packaging, 601.8.3, 601.12.12

general, 601.8.0, 601.11.0

mailer's responsibility, 601.1.7

written, printed, and graphic materials, 601.12.0

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**DBP/USPS-2** Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail, please list the maximum and/or minimum size, weight, shape, or other characteristics that will determine whether the article is mailable or not.

**RESPONSE**

Please see the response to your question DBP/USPS-1 above.

Also, see USPS-T-32, page 19, lines 9 to 12 for the maximum weight limit on letter shaped pieces regardless of the dimensions and page 19 (lines 18-23) and page 20 (lines 1-12) for the eligibility requirements for First-Class Mail Business Parcels. The *Mailing Standards of the United States Postal Service* (Domestic Mail Manual 1-8-06) will be amended through the usual Federal Register process at an appropriate time in the future.

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**DBP/USPS-3** Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail, that weighs one ounce or less, [a] please confirm, or explain if you are unable to confirm, that the postage for that article will be either be 39¢ or 52¢. [b] Please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece. [c] Please list all of the characteristics which will result in the imposition of the 13¢ nonmachinable surcharge.

**RESPONSE**

- (a) Confirmed.
- (b) The *Mailing Standards of the United States Postal Service* (Domestic Mail Manual 1-8-06) that could apply depending on classification of the piece are in the following DMM sections:

**rates and fees**

discount flats

Bound Printed Matter, 363.1.0  
First-Class Mail, 333.1.0  
Library Mail, 383.1.0  
Media Mail, 373.1.0  
Standard Mail, 343.1.0

discount letters

First-Class Mail, 233.1.0  
Standard Mail, 243.1.0

discount parcels

Bound Printed Matter, 463.1.0  
First-Class Mail, 433.1.0  
Library Mail, 483.1.0  
Media Mail, 473.1.0  
Parcel Post, 453.1.0  
Standard Mail, 443.1.0  
Periodicals, 707.1.0

retail mail

Bound Printed Matter, 163.1.0  
Express Mail, 113.1.0  
First-Class Mail, 133.1.0  
Library Mail, 183.1.0  
Media Mail, 173.1.0  
Parcel Post, 153.1.0  
Priority Mail, 123.1.0

- (c) See Domestic Mail Classification Schedule § 232.

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**DBP/USPS-4** Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs over one ounce and less than 13 ounces, please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

**RESPONSE**

Computing postage is explained in the *Mailing Standards of the United States*

*Postal Service* (Domestic Mail Manual 1-8-06) in the following sections:

**postage**

See also *rates* in individual classes of mail computing postage, 604.7.0

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**DBP/USPS-5** [a] Please provide the characteristics and requirements of a mailpiece defined as a "letter", "flat", and "parcel" as they refer to First-Class Mail. [b] Please describe any changes that are being made in this Docket. [c] Please indicate the other classes of mail that utilize a definition for a "letter", "flat", and/or "parcel" and describe any differences.

**RESPONSE**

[a] Please see the response to your question DBP/USPS-1 and DBP/USPS-2.

[b] Please see the response to DBP/USPS-1; Processing categories for all classes of mail are explained in the *Mailing Standards of the United States Postal Service* (Domestic Mail Manual 1-8-06) in section 601.1.

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**DBP/USPS-6** Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs one ounce or less, [a] please confirm, or explain if you are unable to confirm, that the postage for that article will be either be 42¢, 62¢, or \$1.00. [b] Please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

**RESPONSE**

[a] Confirmed, assuming that the mailer is using single-piece rates and not presort rates.

[b] Please see the responses to the following interogaotories: DBP/USPS-1, DBP/USPS-2 and DBP/USPS-4. See also, USPS-T-32 pages 6 through 9.

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**DBP/USPS-7** Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs over one ounce and less than 13 ounces, please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

**RESPONSE**

Please see the responses to interrogatories DBP/USPS-1, DBP/USPS-2 and DBP/USPS-4. See also, USPS-T-32 pages 6 through 9.

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**DBP/USPS-8** Please confirm, or explain if you are unable to confirm, that the proposed postage for a First-Class Mail article weighing under 13 ounces will have a base rate of either 42¢, 62¢, or \$1.00 based on its size/shape characteristics which covers the first ounce and then 20¢ for each additional ounce above the first ounce regardless of its size/shape or characteristics.

**RESPONSE**

Confirmed, assuming that the mailer is using single-piece rates. Please see USPS-T-32, page 9.

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**DBP/USPS-9** Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the weight of the mailpiece will not change and can be measured by a scale.

**RESPONSE**

The moisture content in paper can be affected by the relative humidity of the environment. Consequently, weight of a mail piece may change, albeit slightly, as a result of changing relative humidity. The following link highlights some research on this subject:

<http://palimpsest.stanford.edu/byauth/kiely/moisture.html>

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**DBP/USPS-10** Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the length and height of the mailpiece will normally not change and can be easily measured by a ruler.

**RESPONSE**

Confirmed.

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**DBP/USPS-11** [a] Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the thickness of the mailpiece may be subject to change depending on the compression that is applied to the mailpiece. [b] Please advise what level of compression will be applied by the Postal Service in evaluating the thickness of the mailpiece. [c] Please confirm, or explain if you are unable to confirm, that if the thickness of the mailpiece exceeds the allowable limit at any point in the surface of the mailpiece, the entire mailpiece will be assumed to have that higher value.

### RESPONSE

[a] Application of material compression to a mail piece could, at least temporarily, affect its apparent thickness. The picture below is of a USPS Letter-Size Mail Dimensional Standards Template, Notice 3a, which is routinely used by acceptance clerks to determine the  $\frac{1}{4}$  inch thickness. Pressure is not applied to a mail piece to evaluate its thickness at the time of acceptance. Either the mail piece fits into the slot in the Notice 3A template or it does not.



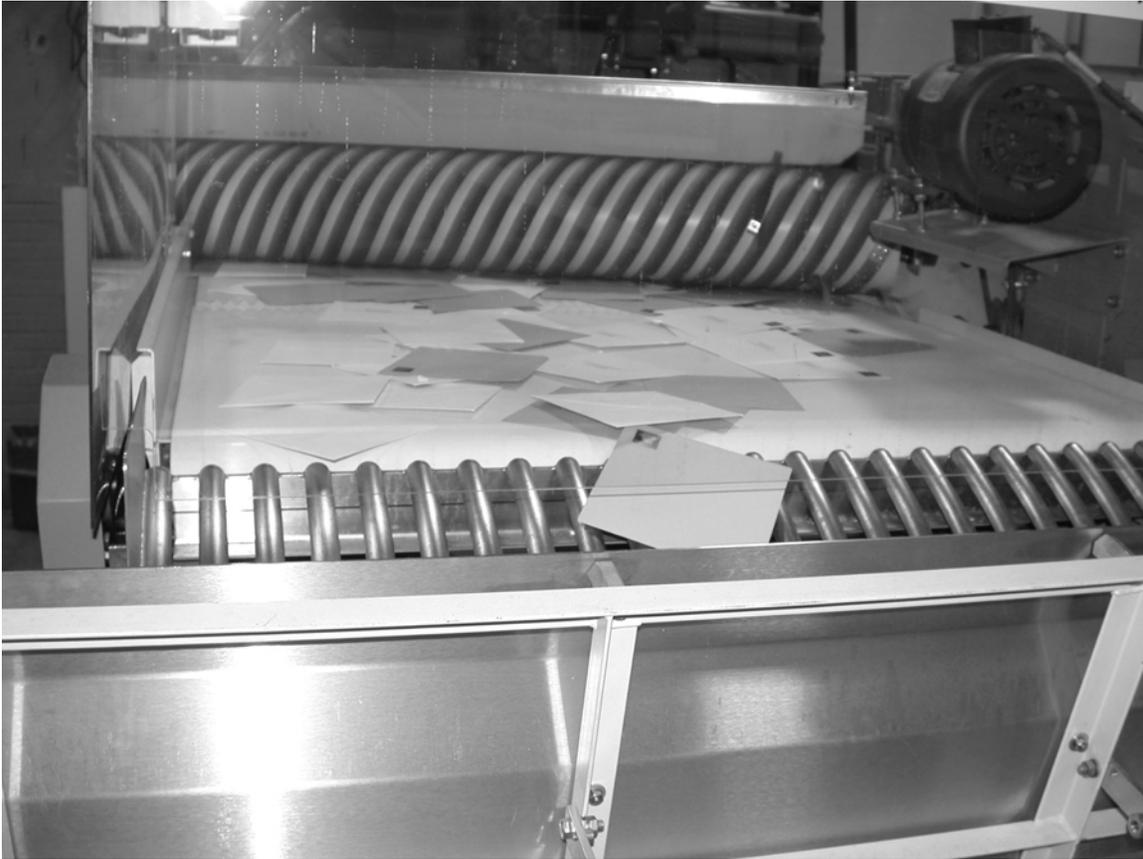
Notice 3a template

[b] Initially, in a processing facility, parcel shaped pieces are manually culled out of the mail stream feeding into Advance Facer Cancellor System (AFCS). Pieces that exceed  $\frac{1}{4}$  inch thickness that may still remain in the mail stream are culled out by the culling belts. Minimum pressure is

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**RESPONSE to DBP/USPS-11 (continued):**

applied in this culling operation to protect the mailpiece (picture of the culling belt provided below) from being damaged.



AFCS Culling Operation

[b] See the response to subpart [a] above.

[c] Confirmed.

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**DBP/USPS-12** [a] Please confirm, or explain if you are unable to confirm, that at the present time a one-ounce or less First-Class Mail article that exceeds the 1/4 inch thickness will be subject to a 13¢ surcharge. [b] Please describe the method that processing plants utilize to determine whether a mailpiece exceeds a thickness of 1/4 inch [please provide a photograph of the equipment].

**RESPONSE**

[a] Confirmed.

[b] Please see the response to DBP/USPS-11 subpart a.

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**DBP/USPS-13**                    Please describe in detail, including pictures, the method that a retail window clerk will utilize to determine whether the thickness of a mailpiece exceeds 1/4 inch.

**RESPONSE**

Please see the response to DBP/USPS-11, subpart a. The Postal Service has no photographs available depicting the methods that are utilized. The photographs provided in response to DBP/USPS-11 were not taken for purposes of responding to that interrogatory, but were coincidentally readily available. Accordingly, they were provided.

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**DBP/USPS-14** [a] Please describe in detail the methods that a retail window clerk will utilize under the proposed rules to determine whether a First-Class Mail article weighing less than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece. [b] Same as subpart a except provide a response for the methods for a processing facility.

**RESPONSE**

[a-b] Appropriate methods will be developed for utilization by clerks as rules are appropriate rules are developed.

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**DBP/USPS-15** Please describe in detail the methods that a mailer will be expected to utilize under the proposed rules to determine whether a First-Class Mail article weighing less than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece.

**RESPONSE**

As they do whenever there are Domestic Mail Classification Schedule and Domestic Mail Manual changes, mailers will be expected to refer to the amended DMM and other materials for guidance and to consult bulk mail and retail window clerks on a case-by-case basis, as needed.

## **RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-16** Please discuss the methods by which First-Class Mail letters, flats, and parcels will be processed and handled and the instances where articles which are properly paid at one category will be processed in another category such as a mailpiece which requires postage at the flat rate will still be processed as a letter.

### **RESPONSE**

Witnesses McCrery and Coombs discuss processing methods for letters, flats, and parcels. See USPS-T-42 (sections II.A, IIB., II.C; USPS-T-44 (section 3.2), respectively. Several shapes may be routinely processed together in selected operations. Carriers case residual (not automation compatible) letters with flats for their routes. Some carriers may also case selected small parcels in the same case for non-walking portions of their route. USPS-T-44 at 16. In mail processing, very low volumes may result in manually casing two shapes together, primarily flats and small parcels and rolls (SPRs), when the fixed costs of setting up and taking down two separate schemes exceed any possible savings due to processing the two shapes separately. In automation, letters may be processed as flats when the specific characteristics of the pieces will result in unacceptable jams on letter sorting machines, but the same letters would process well on flat sorters. For example, letters containing optical disks are relatively rigid and, depending on the envelope design, may be processed in flats automation. Similarly, marginal flats may be processed as parcels. The opposite processing strategy, e.g., running promising flats on letter automation, is highly unlikely due to the probability of processing problems in subsequent sorting or carrier operations.

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**DBP/USPS-17** [a] Please discuss in detail the action that is taken by the Postal Service when shortpaid mail is discovered. Please include discussion of the action taken for different classes of mail, whether it is shortpaid or has no postage affixed, the quantity involved, whether the mailpiece has a return address, etc. [b] Please provide any specific procedure involved in handling a one ounce mailpiece that requires the 13¢ surcharge and has only a 39¢ stamp affixed. [c] Please describe any changes in dealing with shortpaid mail that will be made as a result of the proposed rates and classification. [d] How will shortpaid mail be handled that results from a misclassification of a mailpiece between a letter, flat, or parcel?

**RESPONSE**

[a-b] Please see DMM 604.8 for Insufficient or Omitted Postage. Please see

DMM 604.10 on how revenue deficiencies are handled by the Postal Service.

[c] At an appropriate time, internal review will determine whether such changes are necessary.

[d] See the response to subpart [c]. As deemed necessary, procedures for handling such mail will be developed at an appropriate time.

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**DBP/USPS-19** In the Opinion and Recommended Decision for Docket R2005-1, the Commission stated in footnote 72 with respect to the \$1 charge that is being made for Change of Address requests that are made on the Internet that, "The Commission expects this issue to be raised again in the next omnibus rate case." [a] Please advise the Rate Schedule and DMCS Section that contain this \$1 fee. [b] If it was not included, please provide the reasons for not doing so.

**RESPONSE:**

[a-b] The \$1 charge for Change of Address requests that are made on the Internet are not listed in the rate and fee schedules or the DMCS. When completing a change of address online or over the telephone, customers are asked to provide a credit card number. To enhance security and prevent fraudulent changes of address, this credit card number is checked against the credit card company's database to provide identity validation. The credit card companies do not perform this validation for free. They require a minimum charge on the credit card, imposed by the credit card company on the card holder. The dollar charge is a result of this third-party requirement, rather than a charge to be included in the rate and fee schedules or the DMCS.

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**DBP/USPS-20**                      Please provide a complete listing of the methods by which a customer may file for a change of address and the fee, if any, associated with each method.

**RESPONSE:**

<b>COA Type</b>	<b>Customer Access</b>	<b>Charge</b>
PS Form 3575 ( Official Mail Forwarding Change of Address)	Mover's Guide Kits available at the local Post Office	None
3575www (Customer Prints Form and Provides to Post Office)	Internet / Customer Printer	None
ICOA (Internet Change of Address)	Internet – <a href="http://www.usps.com">www.usps.com</a>	\$1 charged to customer's credit card to verify identity
TCOA (Telephone Change of Address)	Telephone – 1-800-ASK-USPS	\$1 charged to customer's credit card to verify identity

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**DBP/USPS-21** Poster 313 dated April 2006 indicates that, "Service Performance information is available at [www.usps.com](http://www.usps.com)." [a] Please advise the specific location on the website that contains this data. [b] Please advise how a visitor to the home page will be informed that this data exists and the links that would be followed. [c] Please provide a listing of the data that is available for viewing including what information is shown for each category. [d] What is the date of each of the categories and how often are they updated?

**RESPONSE**

- (a) The data can be accessed directly at [www.usps.com/serviceperformance](http://www.usps.com/serviceperformance) or via a link within the Rate Calculator application at <http://postcalc.usps.gov> and also within the Click-n-Ship application via a link on the Service & Postage Options page.
- (b) A visitor to the home page can enter the term "service performance" or "service performance scores" into the SEARCH box function. They will then be sent to a search results page, where they have the option to click on the Domestic Service Performance link. This link will take the customer to the service performance information at [www.usps.com/serviceperformance](http://www.usps.com/serviceperformance) .
- (c-d) To the extent reported either by the External First-Class Mail service performance measurement system or the Product Tracking System, the data consist of national aggregate service performance scores for retail First-Class Mail, Priority Mail, Express Mail and Package Services by service standard day, updated on a quarterly basis. The Service Performance Information page also includes a link to a chart depicting the Guaranteed Day of Delivery for Next Day and Second Day Express Mail Based Upon Day of Mailing. The first quarter for which data are reported is FY2006 Q2. The posting will be updated quarterly.