

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS- 5, 10, 21-23, 25)

The United States Postal Service hereby files its responses to the above listed interrogatories, filed on June 9, 2006, and due on June 23, 2006. A motion for late acceptance is being filed this day.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Brian M. Reimer  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -5402  
July 7, 2006  
Brian.M.Reimer@usps.gov

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-5.** For each quarter in FY 2002, FY 2003, and FY 2004, please provide the overall overnight, two-day, and three-day EXFC scores and the overnight, two-day, and three-day EXFC scores for mail destined to post-office boxes.

**RESPONSE:**

Please see the attached table.

External First-Class Mail Measurement System								
			FY 2002		FY 2003		FY 2004	
			All Deliveries	PO Box Deliveries	All Deliveries	PO Box Deliveries	All Deliveries	PO Box Deliveries
Quarter I								
	Overnight		92.94	90.98	94.23	92.10	94.88	93.64
	Two Day		82.07	81.81	90.05	88.47	89.97	90.23
	Three Day		72.35	70.38	88.44	85.73	85.48	84.75
Quarter II								
	Overnight		93.47	90.99	94.55	91.78	95.29	93.92
	Two Day		82.25	82.04	88.50	87.03	91.12	90.34
	Three Day		73.52	70.59	83.43	80.31	87.89	83.60
Quarter III								
	Overnight		94.17	91.74	95.18	93.22	95.61	94.03
	Two Day		86.44	85.67	91.04	89.84	91.99	89.37
	Three Day		83.41	81.92	89.09	87.26	90.97	86.87
Quarter IV								
	Overnight		94.11	92.90	95.04	94.31	95.28	94.17
	Two Day		89.03	87.83	91.37	90.70	92.05	89.91
	Three Day		87.64	85.09	90.24	89.12	90.61	87.78

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-10.** For each year since and including 2004, please identify the percentage of First-Class Mail that was destined to one-day, two-day, and three day delivery areas, according to the Postal Service's service standards for First-Class Mail. Please specify whether the response includes Priority Mail.

**RESPONSE:**

The data in this response excludes Priority Mail.

Percentage of First-Class Mail Volume Under Given First- Class Service Standards	1-Day Standard	2-Day Standard	3-Day Standard
2004	44.5%	26.5%	29.0%
2005	44.8%	26.3%	28.9%

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-21.** For each of the past three years, and for each category or type of First-Class Mail (excluding Priority Mail) for which the Postal Service collects data, please provide nationwide data from EXFC, ODIS, and any other applicable systems showing:

- a. The percentage of the time that mail is delivered within the number of days specified by the applicable service standard;
- b. The average number of days to delivery.

**RESPONSE:**

Please see the attached table.

External First-Class Mail Measurement System						
FY 2003			FY 2004		FY 2005	
	On Time Performance Estimate	Average Delivery Days	On Time Performance Estimate	Average Delivery Days	On Time Performance Estimate	Average Delivery Days
Letters						
Overnight	95.31	1.09	95.74	1.08	95.71	1.08
Two Day	91.27	1.96	92.17	1.95	91.77	1.97
Three Day	89.11	2.81	89.84	2.81	88.32	2.85
Cards						
Overnight	90.75	1.18	91.48	1.16	91.31	1.17
Two Day	84.66	2.12	86.69	2.08	86.25	2.10
Three Day	82.95	2.98	84.64	2.96	82.83	3.02
Flats						
Overnight	88.53	1.20	89.84	1.18	89.29	1.20
Two Day	80.24	2.21	81.12	2.18	79.47	2.25
Three Day	75.78	3.18	76.73	3.16	73.23	3.28

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-22.** For each of the past three years, and for each category or type of Priority Mail for which the Postal Service collects data, please provide nationwide data from PETE, ODIS, and any other applicable systems showing:

- a. The percentage of the time that mail is delivered within the number of days specified by the applicable service standard;
- b. The average number of days to delivery.

**RESPONSE:**

(a)-(b) While PETE is no longer used to measure Priority Mail Service performance, the following data are available for FY2003 to FY 2005.

Priority End-to-End Measurement System						
	FY 2003		FY 2004		FY 2005	
	On Time Performance Estimate	Average Delivery Days	On Time Performance Estimate	Average Delivery Days	On Time Performance Estimate	Average Delivery Days
Letters						
Overnight	92.87	1.11	92.27	1.13	92.18	1.11
Two Day	86.62	2.07	89.59	2.01	88.41	2.05
Parcels						
Overnight	91.26	1.13	91.36	1.13	89.97	1.15
Two Day	87.59	2.05	88.82	2.03	87.59	2.06
Flats						
Overnight	92.53	1.11	93.43	1.10	92.47	1.11
Two Day	87.35	2.05	89.84	2.01	88.45	2.05

The following data are taken from ODIS-RPW. ODIS-RPW may misstate Priority Mail service performance, most likely understating it, because it lacks the same quality controls that would be put into place by a third party vendor.

For example, mailers who use metered indicia have complete control over the date printed by the metering machine and the date and city in which the metered mail is deposited in collection boxes. The typical office scenario is that an office employee drops the outgoing mail into a collection box on the way home.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**RESPONSE TO DFC/USPS-22 (continued)**

The Postal Service cannot control whether the mail is dropped after the last collection of a day, in which case ODIS-RPW will tend to report the mail as late, when, in fact it is not.

The Postal Service cannot control whether the meter date is set correctly, is stale, or is set in the future. Stale meter dates cause ODIS -RPW to tend to report mail as late when it is not. Future dates are recoded to be "cannot be read," which allows the pieces to be counted for origin and destination volume, but not as on-time, or late.

The Postal Service also cannot always control the location at which mail is dropped into the system, regardless of the terms of use specified in the meter license. In fact, many clerical staff may not even know those rules. For example, an employee can live in one service area, like Washington, DC, work in another, like Northern Virginia, and drop the office mail into a collection box on the way home. If mail bearing a Northern Virginia meter impression is deposited into a Washington, DC, collection box, it could be misattributed by ODIS-RPW as to origin, and reported as late, when, in fact it is not (given its DC origin). Northern Virginia may have overnight service to parts of Virginia that have two day standards from Washington, DC.

Please also note that the Postal Service has only measured performance for the first two days of Priority Mail delivery under both PETE and PTS. The ODIS-RPW system generates data for three days, which are being provided here because they have been provided in prior rate cases.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**RESPONSE TO DFC/USPS-22 (continued)**

The numbers produced by ODIS are as follows:

Percent of Mail Delivered On-Time, Priority Mail, FY 2003			
			Total
1-Day Service Standard			83.6
2-Day Service Standard			78.9
3-Day Service Standard			73.3
Percent of Mail Delivered On-Time, Priority Mail, FY 2004			
			Total
1-Day Service Standard			83.8
2-Day Service Standard			79.2
3-Day Service Standard			71.5
Percent of Mail Delivered On-Time, Priority Mail, FY 2005			
			Total
1-Day Service Standard			81.2
2-Day Service Standard			76.0
3-Day Service Standard			69.7

Average Days to Delivery, Priority Mail, FY 2003			
			Total
1-Day Service Standard			1.27
2-Day Service Standard			2.23
3-Day Service Standard			3.08
Average Days to Delivery, Priority Mail, FY 2004			
			Total
1-Day Service Standard			1.27
2-Day Service Standard			2.23
3-Day Service Standard			3.12
Average Days to Delivery, Priority Mail, FY 2005			
			Total
1-Day Service Standard			1.32
2-Day Service Standard			2.31
3-Day Service Standard			3.25

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-23.** For each of the past three years, and for each category or type of Express Mail for which the Postal Service collects data, please provide nationwide data showing:

- (a) The percentage of the time that mail is delivered within the number of days specified by the applicable service standard or delivery guarantee;
- (b) The average number of days to delivery.

**RESPONSE:**

The following data is derived from the Product Tracking System (PTS). Please note that the scheduled delivery date under PTS may not necessarily correspond to the guarantee that the customer receives and upon which refund decisions are based. Please note that the numbers below are measurements of mutually exclusive mail streams. They are not cumulative.

a) The following data is for FY 2005. For previous year data, see Docket No. R2005-1, Tr. 8C/4370.

	Percent On Time (FY05)
<b>Post Office to Post Office</b>	
Express Mail - Retail - Domestic - Next Day 10:00	90.60%
Express Mail - Retail - Domestic - 2 Day 10:00	97.09%
Express Mail - Retail - Domestic - 3 Day 10:00	99.25%
Express Mail - Retail - Domestic - 4 Day 10:00	99.44%
<b>Post Office to Addressee</b>	
Express Mail - Retail - Domestic - Next Day 12:00	95.29%
Express Mail - Retail - Domestic - Next Day 3:00	94.74%
Express Mail - Retail - Domestic - 2 Day 12:00	96.03%
Express Mail - Retail - Domestic - 2 Day 3:00	93.80%
Express Mail - Retail - Domestic - 3 Day 12:00	97.91%
Express Mail - Retail - Domestic - 3 Day 3:00	96.81%
Express Mail - Retail - Domestic - 4 Day 12:00	98.53%
Express Mail - Retail - Domestic - 4 Day 3:00	98.68%

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**RESPONSE TO DFC/USPS-23 (continued)**

b) The following data is for FY 2005. For previous year data, see Docket No.

R2005-1, Tr. 8C/4371.

	Avg. Days Delivered
<b>Post Office to Post Office</b>	
Express Mail - Retail - Domestic - Next Day 10:00	0.67
Express Mail - Retail - Domestic - 2 Day 10:00	0.78
Express Mail - Retail - Domestic - 3 Day 10:00	0.81
Express Mail - Retail - Domestic - 4 Day 10:00	0.87
<b>Post Office to Addressee</b>	
Express Mail - Retail - Domestic - Next Day 12:00	0.89
Express Mail - Retail - Domestic - Next Day 3:00	0.97
Express Mail - Retail - Domestic - 2 Day 12:00	1.24
Express Mail - Retail - Domestic - 2 Day 3:00	1.56
Express Mail - Retail - Domestic - 3 Day 12:00	1.71
Express Mail - Retail - Domestic - 3 Day 3:00	1.76
Express Mail - Retail - Domestic - 4 Day 12:00	1.56
Express Mail - Retail - Domestic - 4 Day 3:00	1.93

Note: The average days to deliver the Express Mail piece is the hours to deliver divided by 24 (the number of hours in a day). The hours to deliver are the amount of time from the time of acceptance to the time of attempted delivery or delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-25.** Please provide all information concerning time to delivery and other aspects of delivery performance that is or may be available from an analysis of data collected from the scanning of bar-coded labels for Express Mail, Certified Mail, Registered Mail, Insured Mail, Return Receipt for Merchandise, Delivery Confirmation, and Signature Confirmation.

**RESPONSE:**

Information concerning time to delivery and other aspects of delivery performance is available from barcoded label scans only for Express Mail, and for Priority Mail and Package Services mail with Delivery Confirmation or Signature Confirmation, when the pieces receive both an acceptance scan and a delivery scan. The available information is presented at [www.usps.com/serviceperformance/welcome.htm](http://www.usps.com/serviceperformance/welcome.htm). Also see the responses to DFC/USPS-22 and 23, DBP/USPS-89(c), OCA/USPS-T34-1, and OCA/USPS-2-7.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

---

Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037, FAX: -5402  
July 7, 2006  
Brian.M.Reimer@usps.gov