

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-276-292]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory; however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses 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 should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], 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."

July 14, 2006

Respectfully submitted,

R20061HH276

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

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DBP/USPS-276                      Please refer to your response to Interrogatory DBP/USPS-125. Please list all of the places/methods by which a mailer may enter Post Office to Addressee Express Mail into the system including but not limited to, retail windows, carriers, collection boxes, pick-ups, etc.

DBP/USPS-277                      Please refer to your response to Interrogatory DBP/USPS-125. Please advise why Post Office-to Post Office is limited to mailing at post office, stations, or branches and may not be mailed with carriers, in collection boxes, or on pick-ups.

DBP/USPS-278 [a] May Express Mail be deposited in any blue collection box or is it limited to depositing in specifically designated Express Mail boxes?

[b] Please discuss the rationale for your response.

DBP/USPS-279 [a] Please advise how the time[s] are selected for collecting an Express Mail collection box.

[b] Must the time[s] be selected so that the mail will arrive back at the post office at such time as to be able to meet all of the service guarantees for the earliest cut-off time of the day at the retail service window?

[c] If not, why not?

[d] If an article is mailed prior to the collection time at the blue Express Mail collection box will it receive the same service guarantee as it would have if it was mailed at the retail service window prior to the earliest cut-off time of the day?

[e] If not, why not?

[f] Please explain how the postal clerk who is entering in an Express Mail article that was collected from a collection box will determine the proper service guarantee if it is already after the cut-off time by time the article is brought back to the post office and processed [i.e. the computer is now advanced to the point that the article was mailed after the cut-off time].

DBP/USPS-280 Please refer to your response to Interrogatory DBP/USPS-135.

[a] Please confirm, or explain if you are unable to confirm, that Post Office-to-Post Office Express Mail is an established service.

[b] Please explain how there could not be market demand for the addition of additional claim locations.

[c] What "harm" would occur if the service was expanded to additional claim locations since the Express Mail transportation system is already in place and it can only serve to increase the volume and revenue.

DBP/USPS-281 Please refer to your response to Interrogatory DBP/USPS-136.

[a] Please confirm, or explain if you are unable to confirm, that for all of the methods you enumerated, the mailer must provide a specific ZIP Code.

[b] For example, a mailer desiring to send PO-PO Express Mail to the Times Square Station in New York NY 10036 will be told that it is not available. Please advise how the mailer

will be able to learn of the nearest and/or most convenient claim location to the originally requested location.

[c] Will the mailer and/or the postal clerk be required to be knowledgeable of other ZIP Codes in the area and keep trying them one-by-one until a satisfactory location is found?

[d] Please advise how a mailer will be advised of the specific claim location if a given ZIP Code has 2 or more retail facilities. For example, the 07102 ZIP Code covers both the main Newark NJ post office and the Washington Park Station [and perhaps other stations also].

[e] If a ZIP Code appears on the listing, is service available to all retail postal facilities that utilize that ZIP Code?

DBP/USPS-282 Please refer to your response to Interrogatory DBP/USPS-138.

[a] Is this listing of PO-PO Express Mail claim locations available on line to mailers who wish to use the service and evaluate the listing to determine the most convenient location to choose?

[b] If not, why not?

DBP/USPS-283 [a] Please update the listing provided in response to subpart e of Interrogatory DBP/USPS-226 in Docket R2005-1 showing the percentage of facilities broken out by Area that have retail service windows open on Saturday.

[b] Please provide a similar listing broken out by Area to show the facilities that have post office box lobbies open on Saturday.

DBP/USPS-284 [a] Please confirm, or explain if you are unable to confirm, that many retail service windows now have extended hours to 7 PM on weekdays and 4 PM on Saturday.

[b] Please provide a listing broken out by Area showing the number of facilities that have these extended hours.

[c] Please discuss the reasons behind the implementation of this service.

[d] Please discuss the success or lack of success of this program.

[e] Please discuss any plans to expand or reduce the number of facilities that have these extended hours.

DBP/USPS-285 [a] Please confirm, or explain if you are unable to confirm, that many facilities now have Automated Postal Centers [APC] installed.

- [b] Please provide a listing broken out by Area showing the number of facilities that have an APC installed.
- [c] Please discuss the reasons behind the implementation of this service.
- [d] Please discuss the success or lack of success of this program.
- [e] Please discuss any plans to expand or reduce the number of APCs in service.

DBP/USPS-286 Please refer to your response to Interrogatory DFC/USPS-T39-37.

- [a] Please discuss the legibility issues in reading an electronic signature.
- [b] Please describe the steps being taken to improve the legibility.

DBP/USPS-287 Please refer to your response to Interrogatory DFC/USPS-23 subpart b relating to Express Mail.

- [a] Please explain why the Postal Service utilizes a system to calculate the average days to deliver by using the hours to deliver divided by 24 rather than using calendar days.
- [b] Please confirm, or explain if you are unable to confirm, that this method will usually provide a lower number than the system of using calendar days would.
- [c] Please confirm, or explain if you are unable to confirm, that the calendar day system is utilized with all other classes of mail.
- [d] Please provide a similar table showing the Average Days to Delivery calculated by means of calendar days instead of Average Hours to Delivery divided by 24.
- [e] Please discuss any reasons that you believe exist on how PO-PO mail can be delivered in less than 21 hours on average regardless of whether it is scheduled for up to 4 days.
- [f] Please discuss any reasons that you believe exist on how PO-Addressee mail can be delivered in less than 2 days on average regardless of whether it is scheduled for 3 or 4 days.

DBP/USPS-288 This Interrogatory is related to the Premium Forwarding Service [PFS].

- [a] Please advise the number of users of the service since the service was established. Please breakdown the time in an appropriate manner to show the changes in users.
- [b] Please advise the total number of weekly mailings have been made since the service was established. Please breakdown the time in an appropriate manner to show the changes in use.
- [c] Please advise the number of users that signed up for each of the various number of weeks that are authorized for the PFS since the service was established.

- [d] Please provide information on the number of weekly mailings that required 2 or more containers to ship a participant's mail.
- [e] Please advise the number of weekly mailings that were mailed in a flat-rate envelope?
- [f] Please advise the number of weekly mailings that were mailed in a flat-rate box?
- [g] Please provide a chart showing the weight in pounds and the zone involved for all of the weekly shipments that were not made in a flat-rate container.
- [h] Please discuss any of the suggestions that have been made for improving the service.
- [i] Please advise any changes in the PFS regulations that are being considered.
- [j] Please advise if there were any reports of fraudulent applications being filed for this service.

DBP/USPS-289                      This refers to your response to Interrogatory OCA/USPS-1 in particular the attached letter as it refers to the measurements of performance for retail Priority Mail.

- [a] Please confirm, or explain if you are unable to confirm, that if a Priority Mail article was not collected or picked-up as scheduled it would not be reflected in the results.
- [b] Please confirm, or explain if you are unable to confirm, that Priority Mail is delivered overnight.
- [c] Please confirm, or explain if you are unable to confirm, that mailers who send Priority Mail to an area in the overnight delivery area will expect their mail to be delivered overnight.
- [d] Please advise why Priority Mail is considered to be a two-/three-day product.
- [e] Please confirm, or explain if you are unable to confirm, that by not indicating that some Priority Mail will be delivered overnight may cause some mailers to utilize Express Mail unnecessarily.
- [f] Please advise what types of scans of the Delivery Confirmation program will indicate the delivery of a mailpiece in the determination of performance statistics.
- [g] Please confirm, or explain if you are unable to confirm, that Delivery Confirmation service may actually slow up the delivery of the mailpiece since it requires that the mailpiece be held out for scanning.
- [h] Please describe the procedures that are utilized in scanning a Priority Mail article at the office of mailing, in transit through the various mail processing facilities, at the delivery office, and in actual delivery.
- [i] Please advise why Delivery Confirmation service is believed to be a valid proxy for all Priority Mail service.

DBP/USPS-290 [a] If a mailer wants to mail a double post card, is it preferred to have the fold at the top or the bottom of the mailpiece?

[b] Please explain the rationale for your response to subpart a.

[c] If your response to subpart a is the bottom of the mailpiece, please explain why the double stamped card sold by the Postal Service has the fold at the top.

DBP/USPS-291 Please refer to the response to Interrogatory DFC/USPS-T39-11. Please confirm, or explain if you are not able to confirm, that the length of a #6-3/4 envelope is 6-1/2 inches, the length of a #9 envelope is 8-7/8 inches, and the length of a #10 envelope is 9-1/2 inches.

DBP/USPS-292 This interrogatory refers to the orange RBCS ID tag that appears on the reverse side of a letter.

[a] What is the purpose of this code?

[b] What data fields are contained in the code?

[c] When, where, and on what types of mail is this code affixed?

[d] Is there a way to manually decode this code?

[e] If so, please provide the information.

[f] If a mailpiece is forwarded or returned to sender, will the original coding cause a problem?

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin July 14, 2006

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