

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
TO INSTITUTIONAL INTERROGATORIES FROM DAVID POPKIN
DBP/USPS-172-180, 182-202
(July 19, 2006)

The United States Postal Service hereby provides its responses to the following institutional interrogatories from David Popkin: DBP/USPS-172-180, 182-202, filed on July 5, 2006. Only a response to DBP/USPS-181 from this set remains outstanding.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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DBP/USPS-172. Please refer to your response to Interrogatory DBP/USPS-50. Please provide a clear copy of the attachment to the response. The "COLOR" column is not clear on the filed copy.

RESPONSE:

The respective colors can be identified from the following list: white, yellow, gray, green, buff, tan, eam (cream), aft (kraft), and ate (rotates, colors may change).

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DBP/USPS-173. Please refer to your response to Interrogatory DBP/USPS-50. Please advise the changes that were made between this Appendix II and the Appendix II from the previous version of the Library Reference.

RESPONSE:

The previous version of USPS-LR-L-134 said, "Appendix II, *Description of First-Class Mail Piece Types (EXVC)*, has been redacted in its entirety (aside from the title) to minimize the potential for a person to identify test pieces." The revised version is unredacted.

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DBP/USPS-174. Please refer to your response to Interrogatory DBP/USPS-51. Please provide a clear copy of the attachments to the response.

RESPONSE:

The copy provided is completely legible. There is no need for another copy.

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DBP/USPS-175. Please refer to your response to Interrogatories DBP/USPS-50 and 51. Please confirm, or explain if you are unable to confirm, that the attachment for Appendix IX consists of two pages and that Page 1 of the attachment was incorrectly associated with the response to Interrogatory DBP/USPS-50.

RESPONSE:

Substantially confirmed. While under the Commission's rules, each interrogatory response is considered unitary, responses to interrogatories are nonetheless typically provided in sets with all responses aggregated into a single PDF. The error made was that of page order, although your characterization reflects a reasonable way of describing the error.

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DBP/USPS-176. Please refer to your response to Interrogatory DBP/USPS-55 subpart a. Did you mean to say pages 1 through 3 rather than just page 3 of Appendix I of USPS-LR-L-134? In any case both Appendix I and the attachment to the response to Interrogatory DBP/USPS-55 are the same listing of those 3-digit ZIP Codes that are covered in the EXFC Program. Please respond to the original request.

RESPONSE:

Confirmed that the intention of the response was to refer to pages 1-3 of Appendix I (or pages 3-5 of USPS-LR-L-134). The two lists are not identical. For example, Richmond appears in the response to DBP/USPS-55, but it does not appear in Appendix I in USPS-LR-L-134.

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DBP/USPS-177. Please refer to your response to Interrogatory DBP/USPS-55 subpart b. Your response was only a general response and did not respond to the original request, namely, an explanation for each of the 3-digit ZIP Code prefixes that are not a part of the EXFC Program. For example, 999 - Ketchikan AK is not a part of the EXFC Program. Please explain specifically why 999 is not included. Please respond to the original request.

RESPONSE:

The exclusion of 999 - Ketchikan, Alaska, and other 3-digit ZIP codes, is based on the same reason supplied in the previous response -- EXFC continuously tests a panel of 463 ZIP Code areas selected on the basis of geographic and volume density from which 90% of First-Class volume originates and 80% destines. EXFC is not a system-wide measurement of all First-Class Mail performance.

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DBP/USPS-178. Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired.

- [a] When was the PETE Program retired?
- [b] Why was the PETE Program retired?
- [c] What methods does the Postal Service utilize to evaluate the performance of Priority Mail?
- [d] Please provide information similar to that which was provided in Library Reference USPS-LR-L-134 for the PETE replacement program.
- [e] What sections of Library Reference USPS-LR-L-134 are no longer valid?

RESPONSE:

[a]-[c] As of the beginning of FY 2006, PETE is no longer used as the service performance measurement system for Priority Mail. The Postal Service decided to use the Product Tracking System (PTS) to measure service performance for Priority Mail beginning in FY 2006.

- [d] No similar information is relevant for PTS, which does not utilize a third party contractor.
- [e] None.

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DBP/USPS-179. Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired and yet some Interrogatories have been responded to as if it is still an operational program [for example, Interrogatory DBP/USPS-81]. For each of the responses that responded as if PETE was an active program, please file updated responses to cover the new Priority Mail evaluation program.

RESPONSE:

In stating that PETE has been retired, the response to DBP/USPS-55 intended to indicate that

PETE no longer is used as the service performance measurement system for Priority Mail.

There is no need to update the response to DBP/USPS-81, or any other responses.

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DBP/USPS-180. Please refer to your response to Interrogatory DBP/USPS-55 subparts a and b. Your response indicates that the PETE Program has been retired and yet some Interrogatories have been responded to stating that it has been retired [for example, Interrogatory DBP/USPS-55]. For each of the responses that responded that PETE was an inactive program, please file updated responses to cover the new Priority Mail evaluation program.

RESPONSE:

In stating that PETE has been retired, the response to DBP/USPS-55 intended to indicate that PETE no longer is used as the service performance measurement system for Priority Mail.

There is no need to update the response to DBP/USPS-55, or any other responses.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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DBP/USPS-182. Please confirm, or explain if you are unable to confirm, the following:

- [a] Managers' compensation is affected by their EXFC scores.
- [b] As a result of the EXFC Program, blue collection boxes are scanned upon collection.
- [c] As a result of the EXFC Program, a missed or early collection of a blue collection box will result a new collection being made to collect the mail to allow for a timely dispatch.
- [d] As a result of the EXFC Program, missent mail, either in the same office or in other offices, will result in specific efforts to ensure that the mail is delivered in a timely manner, even if it requires separate trips, rather than just putting it back into the system and allowing it to be delivered the following day.

RESPONSE:

[a]-[d] While compensation can be affected by EXFC scores, it is not clear that the described actions are caused by EXFC.

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DBP/USPS-183. Please confirm, or explain if you are unable to confirm, that, in general, if an individual post office removes one or more collection boxes they may believe they will have either improved EXFC scores and/or an easier time to achieve the EXFC score.

RESPONSE:

Not confirmed. Whether as inanimate objects or management constructs, post offices are incapable of belief. Removal of collection boxes does not change EXFC scores.

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DBP/USPS-184. Please confirm, or explain if you are unable to confirm, that, in general, if an individual post office advances the collection time of one or more collection boxes they may believe they will have either improved EXFC scores and/or an easier time to achieve the EXFC score.

RESPONSE:

See the response to DBP/USPS-183.

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DBP/USPS-185. Please advise whether the actions noted in Interrogatories 182 through 184 are applied equally at both offices that are a part of the EXFC Program as well as at those that are not.

RESPONSE:

The requested information is not available.

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DBP/USPS-186. Please refer to your response to Interrogatory DBP/USPS-63. Your response refers to an obsolete manual and does not specifically respond to the question, namely, an EXFC dropper will report that a particular letter was mailed in a particular collection box at a particular time. This Interrogatory is attempting to evaluate the specific methods that are utilized to ensure that this data is accurate. For example, one possible method appears to be that the dropper will call on a cell phone immediately after mailing the mail. Another appears to be that the dropper will be required to report the collection box number to help "prove" that the mail was actually deposited in that box.

RESPONSE:

The response to DBP/USPS-63 referred you to a document that describes "the procedures that are utilized to ensure that the data provided by EXFC droppers is accurate." The description answers your question directly and retains its vitality.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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DBP/USPS-187. Please refer to your response to Interrogatory DBP/USPS-64.

- [a] Please confirm, or explain if you are unable to confirm, that a blue collection box must be collected on or after the time posted on the box.
- [b] How late after the time posted on the box may the collector make the collection?
- [c] In the example provided in your original response, please confirm, or explain if you are unable to confirm, that the box could have been collected at 2:20 PM.
- [d] Please explain how the dropper activity would be considered if the mail was collected and processed on a Tuesday when it utilized a Wednesday date.
- [e] Does IBM have access to all collection times at a given box or only the last collection of the day?

RESPONSE:

- a. Not confirmed. While blue collection boxes are not collected, mail within them is collected in accordance with the schedule posted on each.
- b. The *Postal Operations Manual* specifies: "Motorized collections are not to be made earlier than the scheduled time and should be made no later than 20 minutes after the posted time. ... Letter carrier collections from residential collection boxes must not be made before the scheduled time and should be made within 20 minutes after the posted time to the extent practicable."
- c. Not confirmed. However, while *mail* could have been collected at 2:20 p.m. from the mailbox used as an example in the response to DBP/USPS-64, such collection would not comport with the schedule posted on the box.
- d. Anomalous.
- e. Please see the first sentence of the response to DBP/USPS-64(b).

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DBP/USPS-188. Please refer to your response to Interrogatory DBP/USPS-66 subpart a. Your response refers to an obsolete manual and does not specifically respond to the question, namely, an EXFC reporter will report that a particular letter was received on a particular day. This Interrogatory is attempting to evaluate the specific methods that are utilized to ensure that this data is accurate. For example, one possible method appears to be that someone could confirm that a given letter was in a particular mailbox and that it was reported on the correct day.

RESPONSE:

The response to DBP/USPS-66 referred you to a document that describes “the procedures that are utilized to ensure that the data provided by EXFC reporters is accurate.” The description answers your question directly and retains its vitality.

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DBP/USPS-189. Please refer to your response to Interrogatory DBP/USPS-66 subpart b. This subpart was not responded to. The request relates to how the USPS will independently conduct a test of reporter accuracy.

RESPONSE:

The response to DBP/USPS-66 referred you to the response to DBP/USPS-116/R2005-1. That response referred to language in the applicable SOW where the requested procedures are described. Since the current SOW contains the same language, the previous response remains fully responsive.

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DBP/USPS-190. Please refer to your response to Interrogatory DBP/USPS-69. Has this method ever been utilized by the United States Postal Service?

RESPONSE:

Your question is already answered in the response to DBP/USPS-69.

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DBP/USPS-191. Please refer to your response to Interrogatory DBP/USPS-70. This interrogatory asks a specific question that can be answered regardless of the method of evaluating service performance. Please respond to the questions that were asked.

RESPONSE:

As reflected in the response to DBP/USPS-70, the Postal Service has “not explored evaluating service performance as postulated by this interrogatory.” As such, it is unable either to confirm or disconfirm the postulates.

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DBP/USPS-192. Please refer to your response to Interrogatory DBP/USPS-71. This interrogatory asks a specific question that can be answered regardless of the method of evaluating service performance. Please respond to the questions that were asked.

RESPONSE:

As reflected in the response to DBP/USPS-71, “The Postal Service, having not explored evaluating service performance as postulated by this interrogatory, is unable to confirm.” Nor is the Postal Service able to disconfirm the postulate.

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DBP/USPS-193. Please refer to your response to Interrogatory DBP/USPS-76.

- [a] Please advise how IBM selects the specific boxes to utilize for their droppers.
- [b] Does the CPMS database allow for downloading of data by IBM so that they can utilize it in their programs for random selection? Please explain and discuss.
- [c] Does the CPMS database allow for random selection of collection boxes for IBM to utilize for droppers?

RESPONSE:

See section III.D.1.1 (page 13) of the TTMS SOW in USPS-LR-L-134. IBM is required to select specific boxes randomly. Access to CPMS data also implies that such data can be used to effectuate a random selection.

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DBP/USPS-194. Please refer to the two sample size parcels that were utilized in the example in Interrogatory DBP/USPS-143 subpart d.

- [a] Please confirm, or explain if you are unable to confirm that if instead, the actual dimensions of the larger parcel were 18.49 inches each, the dimension weight utilizing the unrounded 18.49 inches would be 33 pounds while the dimension weight utilizing the 18 inches as the rounded value would only be 31 pounds.
- [b] Please confirm, or explain if you are unable to confirm that if instead, the actual dimensions of the smaller parcel were 13.49 inches each, the dimension weight utilizing the unrounded 13.49 inches would be 13 pounds while the dimension weight utilizing the 13 inches as the rounded value would only be 12 pounds.
- [c] Will the rounding off to the nearest inch be either a permissible or a mandatory procedure in determining if the parcel exceeds one cubic foot in the first place? Please explain.

RESPONSE:

[a] Confirmed, though the calculations are dimensional weights, not “dimension weights.”

[b] Confirmed, though the calculations are dimensional weights, not “dimension weights.”

[c] If the Postal Service does in fact round dim-weight measurements to the nearest whole inch, then those rounded factors will be used in determining whether a parcel exceeds one cubic foot in the first place, and that determination is likely to be a uniform procedure, if that is what you mean by “mandatory.”

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DBP/USPS-195. Please confirm, or explain if you are unable to confirm, that the largest dimension weight possible for a parcel that does not exceed 108 inches length plus girth would be 52 pounds.

RESPONSE:

Not confirmed. A regularly shaped parcel not exceeding 108 inches in combined length and girth can range up to 60.1 pounds in dimensional (note: not "dimension") weight (length = 36 inches, width = 18 inches, height = 18 inches).

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DBP/USPS-196. Please provide a chart that will show for one pound increments from 1 pound to 52 pounds along the left side of the chart and the following data along the top of the chart:

- [1] The number of Priority Mail parcels destined to Zone 5 or beyond.
- [2] The number of those parcels expected to be one cubic foot or greater.
- [3] The number of those parcels that are expected to have a higher dimension weight postage than an actual weight postage.

The data should be provided for one or more recent one year period.

RESPONSE:

[1] Following is weight-rated Priority Mail parcels volume up to 52 pounds in Zones 5 - 8 for FY 2005.

1	105,031,868	14	708,140	27	112,344	40	16,220
2	101,091,639	15	577,648	28	66,441	41	21,446
3	39,055,300	16	453,796	29	87,932	42	38,637
4	18,603,271	17	402,804	30	64,093	43	15,520
5	10,521,672	18	280,157	31	46,565	44	13,524
6	7,201,950	19	318,325	32	62,236	45	12,107
7	4,661,631	20	214,240	33	52,225	46	10,648
8	3,503,205	21	248,617	34	52,604	47	10,047
9	2,478,039	22	175,752	35	42,932	48	8,446
10	1,859,931	23	136,298	36	48,846	49	7,747
11	1,507,233	24	115,477	37	34,279	50	10,884
12	1,134,059	25	120,955	38	32,231	51	9,559
13	884,389	26	104,506	39	42,593	52	8,354

[2] For the Test Year After Rates (Before Dim-Weighting), the following tables show total Priority Mail volume, separately identifying that portion which is larger than one cubic foot: USPS-LR-L-120, Exhibit I, Table Z5-2 for Zone 5; Exhibit II, Table Z6-2 for Zone 6; Exhibit III, Table Z7-2 for Zone 7; and Exhibit IV, Table Z8-2 for Zone 8.

[3] For the Test Year After Rates (Before Dim-Weighting), the shaded areas of the following tables show, for parcels larger than one cubic foot, those having a dimensional weight in excess of actual weight (therefore qualifying for dim-weighting): USPS-LR-L-120, Exhibit I, Table Z5-5 for Zone 5; Exhibit II, Table Z6-5 for Zone 6; Exhibit III, Table Z7-5 for Zone 7; and Exhibit IV, Table Z8-5 for Zone 8.

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RESPONSE TO DBP/USPS-196 (cont.)

The shading extends only to 36 pounds because parcels larger than three cubic feet are, for convenience, grouped together and assigned an average cubic volume (e.g., 4.11 cubic feet in Zone 5, for a dim weight of 36.57 pounds). Because an average is used for that cubic-volume range, the total parcel count in the shaded portion of the "Over 3.00" cubic-foot column can be considered representative of the total number of parcels larger than three cubic feet that will be eligible for dim-weighting (including those heavier than 36 pounds).

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DBP/USPS-197. Please provide a chart that will show for one pound increments from 1 pound to 20 pounds along the left side of the chart and the following data along the top of the chart:

[1] The number of Priority Mail parcels destined up to Zone 4 including Local.

[2] The number of those parcels expected to have a length plus girth of 84 inches or more. The data should be provided for one or more recent one year period.

RESPONSE:

As clarification, the Priority Mail balloon rate may (depending on weight) apply to parcels measuring more than 84 inches in combined length and girth, not to parcels measuring "84 inches or more" in combined length and girth. But assuming a literal interpretation is requested: Column [1] below shows total weight-rated Priority Mail parcels volume in Zones 1 through 4 (including Local) for FY 2005. Data are not available ("n.a.") for column [2], the share of those parcels that are 84 inches or more in combined length and girth. The only available data for Priority Mail parcel size distributions are from the Priority Mail Parcel Size Distribution and Density Study, documented in Docket No. MC2004-2, USPS-LR-2. In that study, out of 2,338 parcels sampled in Zones 1 - 4 (including Local) weighing less than or equal to 20 pounds, only 32 had a combined length and girth of 84 inches or more. Those 32 parcels do not constitute a sufficiently large sample to make meaningful extrapolations to the total population of Priority Mail parcels with a combined length and girth of 84 inches or more, especially by weight increment.

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RESPONSE TO DBP/USPS-197 (cont.)

Pound Increment [1]		[2]	Pound Increment [1]		[2]
1	75,461,765	n.a.	11	895,696	n.a.
2	103,374,029	n.a.	12	636,637	n.a.
3	45,107,025	n.a.	13	607,860	n.a.
4	21,709,280	n.a.	14	412,422	n.a.
5	11,157,943	n.a.	15	423,167	n.a.
6	6,504,503	n.a.	16	283,864	n.a.
7	4,076,769	n.a.	17	226,354	n.a.
8	2,553,424	n.a.	18	201,912	n.a.
9	1,794,357	n.a.	19	193,485	n.a.
10	1,208,807	n.a.	20	192,989	n.a.

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DBP/USPS-198. Please provide a chart that will show for one pound increments from 1 pound to 70 pounds along the left side of the chart and percentage of parcels that are transported by air for local parcels and for each of the 8 zones separately along the top of the chart. A total for all parcels should be shown below the 70 pound line on the chart. The data should be provided for one or more recent one year period.

RESPONSE:

Priority Mail parcel volume data are not available for specific modes of transportation, especially by zone and weight increment.

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DBP/USPS-199.

- [a] With respect to irregularly shaped Priority Mail parcels, please confirm, or explain if you are unable to confirm, that the determination of the length plus girth [which is required to determine the implementation of the balloon rate as well as to determine if the parcel is mailable - less than 108 inches] will use a different value for the length and/or width and/or height than will be utilized for the determination of the dimension weight.
- [b] Please confirm, or explain if you are unable to confirm, that the measurement of length plus girth will be made in the same manner whether the mailpiece is Parcel Post, Priority Mail, or Express Mail.

RESPONSE:

[a] Not confirmed. For irregularly shaped parcels, the determination of length will be the same whether measuring length, width and height for dim-weight assessment, or length plus girth either for balloon-rate assessment or to ensure that the parcel is mailable as Priority Mail, *i.e.*, does not exceed 108 inches. Additionally for irregularly shaped parcels, width and height are not required for length plus girth determinations. Rather, girth is measured directly (per DMM Section 101.3.1a). Please note, too, that measuring length plus girth will not be required “to determine the implementation of the balloon rate” in Zones 5 - 8, where dim-weighting but not balloon-rating applies.

[b] Confirmed (though please note that Express Mail has no balloon rate).

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DBP/USPS-200. Please advise both the dimension weight and the length plus girth measurement for the following shaped parcels. Disregard whether the dimension weight or balloon rate or oversize limitations apply since I am interested in the calculation for different shapes and am aware of when the implementation would apply. Please fully explain how each calculation was made. If any additional information is required to make the calculation, please assume an appropriate value and provide it in your response rather than not answering the question.

- [a] A box with a length of 15 inches and a width and height of 10 inches.
- [b] A box with a length of 15 inches and a width of 10 inches and a height of 9 inches.
- [c] A box with a length of 15 inches and a cross section that is perpendicular to the length that is a trapezoid with a base of 10 inches and a height of 9 inches on one side and 10 inches on the other side.
- [d] A round mailing tube that is 30 inches long and 5 inches in diameter.
- [e] A triangular shaped box that was 30 inches long and had triangular sides of 10 inches on each side.
- [f] A triangular shaped box that was 30 inches long and had triangular sides of 10 inches on two of the sides and 5 inches on the third side.
- [g] An automobile tire shaped parcel that has an overall outside diameter of 30 inches and an irregularly shaped cross section [if one were to cut through the tire at one point] with a total girth measurement of 20 inches.
- [h] Same as subpart g except that the cross section is a circle with a circumference of 20 inches.
- [i] A parcel in the shape of a tree. The length of the tree is 48 inches and the maximum girth around the collapsed branches is 20 inches, around the trunk is 10 inches, and around the root system is 30 inches.
- [j] Two separate boxes that are glued together. The bottom box has a length of 15 inches and a height and width of 8 inches each. The top box has a length of 13 inches and a height and width of 7 inches each.
- [k] Same as subpart j except that in addition to the glue the parcels are taped together so that the tape extends out in a triangular shape over part of the bottom of the smaller top box.
- [l] A box with a length of 15 inches and a cross section that is perpendicular to the length that is a trapezoid with a base of 10 inches and a height of 5 inches on one side and 10 inches on the other side.

RESPONSE:

In the following calculations, it is assumed that length, width, height and girth measurements are rounded to the nearest whole inch. The Postal Service has not yet decided what kind of rounding convention will be used for such parcel measurements. Please see the Postal Service's response to DBP/USPS-98[a].

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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Response to DBP/USPS-200 (cont.)

[a] Dimensional weight (note: not “dimension weight”) = $(15 \times 10 \times 10)/194 = 7.73$ pounds. Length + girth = $15 + (2 \times 10) + (2 \times 10) = 55$ inches.

[b] DW = $(15 \times 10 \times 9)/194 = 6.96$ pounds. L + G = $15 + (2 \times 10) + (2 \times 9) = 53$ inches.

[c] Assuming that the cross section is an isosceles trapezoid with right angles at the base, DW = $[(15 \times 10 \times 10) \times 0.785]/194 = 6.07$ pounds. It is also assumed that, owing to the one-inch height differential on the cross section, the box is not discerned to be approximately regularly shaped (*i.e.*, having rectangular panels). Therefore the 0.785 irregularly shaped parcel adjustment factor (0.785) applies. L + G = $15 + (10 + 10 + 9 + 10.05) = 15 + 39$ (when rounded) = 54 inches.

[d] DW = $[(30 \times 5 \times 5) \times 0.785]/194 = 3.03$ pounds. L + G = $30 + 2\pi r = 30 + (2\pi \times 2.5) = 30 + 16 = 46$ inches.

[e] DW = $[(30 \times 10 \times 9) \times 0.785]/194 = 10.93$ pounds. Note: The triangular cross-section’s height is 8.66 inches, which rounds to 9 inches. L + G = $30 + (3 \times 10) = 60$ inches.

[f] DW = $[(30 \times 5 \times 10) \times 0.785]/194 = 6.07$ pounds. Note: The triangular cross-section’s height is 9.68 inches, which rounds to 10 inches. L + G = $30 + (10 + 10 + 5) = 55$ inches.

[g] It is necessary to make an assumption about the “irregular” shape of the cross-section. The simplest case is a circle. In that event, the diameter of the circular cross-section — or the width of the tire — is 6.37 inches, and DW = $[(30 \times 6 \times 30) \times 0.785]/194 = 21.85$ pounds. L + G = $30 + 20 = 50$ inches.

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Response to DBP/USPS-200 (cont.)

[h] Same as subpart [g].

[i] It is necessary to make an assumption about the displacement of the root system (which at maximum girth trumps the collapsed branches). It is assumed that the displacement is concentric, with a cross-sectional diameter therefore of 9.55 inches.

$DW = [(48 \times 10 \times 10) \times 0.785]/194 = 19.42$ pounds.

Note: The tree's maximum cross-sectional width and height (depth) are both 9.55 inches, which round to 10 inches. $L + G = 48 + 30 = 78$ inches.

[j] In accordance with DMM Section 401.1.4 ("Two or more packages may be mailed as a single parcel, if they are about the same size or shape....."), the Postal Service may consider instituting a rule to assess such compound parcels as a single regularly shaped parcel (regularly shaped, because the multiple component packages are "about the same size or shape"). In that case, and assuming that the subject compound parcel is mailable under DMM Section 401.1.4, the dimensional weight would be $[15 \times 8 \times (8 + 7)]/194 = 9.28$ pounds. And the length plus girth would be $15 + (2 \times 8) + [2 \times (8 + 7)] = 61$ inches.

[k] Same as subpart [j].

[l] Assuming that the cross section is an isosceles trapezoid with right angles at the base, $DW = [(15 \times 10 \times 10) \times 0.785]/194 = 6.07$ pounds. $L + G = 15 + (10 + 10 + 5 + 11.18) = 15 + 36$ (when rounded) = 51 inches.

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

DBP/USPS-201. Please provide a chart which shows the number of Priority Mail flat rate envelopes that were mailed in a recent one year period broken out in one ounce increments up to 13 ounces, for 13 to 16 ounces, and in one pound increments above 16 ounces.

RESPONSE:

For FY 2005:

0 - 13 Oz.	67,479,010
13 - 16 Oz.	8,380,096
2 Pounds	24,220,139
3 Pounds	5,402,490
4 Pounds	1,275,010
5 Pounds	221,282
6 Pounds	53,448
7 Pounds	22,112
8 Pounds	13,882
9 Pounds	7,079
10 Pounds	1,476
11 Pounds	3,749
12 Pounds	899
13 Pounds	3,693
14 Pounds	2,055
15 Pounds	0
16 Pounds	587
17 Pounds	1,778
18 Pounds	210
19+ Pounds	0
Total	107,088,998

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

DBP/USPS-202. Please provide a series of three charts showing the number of Priority Mail flat rate boxes that were sent in each of the pound increments and to each of the different zones. Please provide three separate charts. One chart where the postage for the flat rate box is less than the non-flat postage rate, the second where the rates are the same, and the third where the postage rate for the flat rate box is greater than the non-flat postage rate.

RESPONSE:

Please see USPS-LR-L-119, Tables 4, 6 and 7. In Tables 6 and 7, for volume that is estimated to have migrated internally in FY 2005, shading is applied where the flat-rate box costs less than paying by weight and zone. Nowhere does the flat-rate box cost the same as paying by weight and zone. This is because no weight- and zone-based Priority Mail rate cell was \$7.70 (in FY 2005).