

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 DAVID B. POPKIN
(DBP/USPS-277 and 287)
(August 1, 2006)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-277 and 287.

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

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084

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

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.

RESPONSE:

PO-PO Express Mail may be deposited at the locations specified in the response to DBP/USPS-276.

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

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.

RESPONSE:

(a) Please note that the Postal Service does not “utilize” the information provided in the response to DFC/USPS-23. Rather, the Postal Service performed the requested calculation in order to respond to the question asked. The Postal Service provided hours to delivery data based on PTS clock time since Express Mail is a product that is sensitive to the time of day in which it is accepted and delivered, and since it believed that was the information desired by the participant who submitted DFC/USPS-23.

(b) Confirmed, for the simple fact that Express Mail is often delivered at an earlier time in the day than which it is accepted.

(c) Confirmed that, as a general matter, calendar days are the basis for Postal Service service standards. Please see the response to part (a), which notes that

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

the information provided in the response to DFC/USPS-23 is not “utilized” by the Postal Service.

(d) Please see the following:

	Avg. Days
Post Office to Post Office	Delivery
Express Mail - Retail - Domestic - Next Day 10:00	0.94
Express Mail - Retail - Domestic - 2 Day 10:00	1.09
Express Mail - Retail - Domestic - 3 Day 10:00	1.27
Express Mail - Retail - Domestic - 4 Day 10:00	1.22
Post Office to Addressee	
Express Mail - Retail - Domestic - Next Day 12:00	1.05
Express Mail - Retail - Domestic - Next Day 3:00	1.07
Express Mail - Retail - Domestic - 2 Day 12:00	1.51
Express Mail - Retail - Domestic - 2 Day 3:00	1.70
Express Mail - Retail - Domestic - 3 Day 12:00	1.82
Express Mail - Retail - Domestic - 3 Day 3:00	1.91
Express Mail - Retail - Domestic - 4 Day 12:00	1.81
Express Mail - Retail - Domestic - 4 Day 3:00	2.07

The values averaged are simply the difference between the delivery date and the date on which the piece was deposited, without regard to whether the piece was accepted by the cutoff time or whether it was delivered on time.

(e) – (f) The Postal Service has not examined this issue. One reason could be that Express Mail is often accepted at a later time of the day than which it is delivered. This is especially true of PO-PO Express Mail, which has a 10 AM commitment.