

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-43-85]

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."

June 5, 2006

Respectfully submitted,

R200611

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

DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. Please advise what is meant by the term "piece specific data".

DBP/USPS-44 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted. Please confirm, or explain if you are unable to confirm, that EXFC mail pieces are designed so as to be similar in various characteristics to mail pieces that are mailed by the public.

DBP/USPS-45 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] How many letter size mail pieces were mailed in the EXFC program in a recent year?

[b] What is the total number of letter size mail pieces that were mailed by the public during the similar year long period?

DBP/USPS-46 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] How many flat size mail pieces were mailed in the EXFC program in a recent year?

[b] What is the total number of flat size mail pieces that were mailed by the public during the similar year long period?

DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] How many post card mail pieces were mailed in the EXFC program in a recent year?

[b] What is the total number of post card mail pieces that were mailed by the public during the similar year long period?

DBP/USPS-48 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] Please confirm, or explain if you are unable to confirm, that information was provided in Docket R2005-1 that allowed for the preparation of the following chart:

[b] Please provide any corrections or updating that is necessary to update this chart.

[c] Please advise why this information was provided in Docket R2005-1 and yet it was felt to be necessary to redact it in the current Docket.

EXFC EVALUATION BY MAILPIECE CHARACTERISTICS

CODE	TYPE	WIDTH	LENGTH	ADDR	ZIP	CODE	POST	CFM	OVNITE	2DAY	3DAY	
A	C	4	6	PRIN	5	NO	MTR	NO	91.58	85.11	80.31	A
B	C	4	6	HAND	5	NO	STM	NO	89.13	80.86	79.47	B
C	OC	4.75	6.5	HAND	5	NO	STM	NO	95.21	89.77	85.18	C
D	F	9	12	HAND	5	NO	STM	NO	89.38	79.55	70.08	D
E	F	9	12	PRIN	5	NO	MTR	YES	88.78	79.02	69.43	E
F	L	4.125	9.5	PRIN	9	NO	MTR	YES	94.03	89.08	83.20	F
G	L	4.5	10.31	HAND	5	NO	STM	NO	96.32	92.20	86.26	G
H	L	4.125	9.5	HAND	5	NO	STM	NO	96.17	90.99	85.16	H
I	L	3.625	6.5	HAND	5	NO	STM	NO	93.66	88.78	82.71	I
J	L	4.125	9.5	PRIN	5	NO	STM	YES	96.79	92.26	85.71	J
K	L	4.125	9.5	PRIN	9	NO	MTR	YES	95.47	90.71	85.08	K
L	L	4.125	7.25	PRIN	9	NO	MTR	YES	95.26	88.92	82.66	L
M	L	4.125	9.5	PRIN	9	NO	STM	YES	94.61	93.41	85.19	M
N	L	4.125	9.5	PRIN	5	NO	MTR	NO	96.15	91.61	84.85	N
O	L	4.375	7.625	PRIN	9	YES	MTR	YES	95.69	91.00	83.64	O
P	L	3.875	7.5	PRIN	9	YES	MTR	YES	95.55	90.88	83.99	P
Q	L	3.625	6.375	PRIN	9	NO	MTR	YES	94.19	88.98	82.55	Q
R	L	4.125	9.5	PRIN	9	NO	MTR	YES	96.62	92.33	85.57	R
S	L	3.875	8.875	PRIN	9	YES	STM	NO	94.93	93.14	87.13	S

CODE Mailpiece code A through S
TYPE Mailpiece type // C=card OC=Oversize card F=Flat L=Letter
WIDTH Width in inches
LENGTH Length in inches
ADDR PRIN=address is printed HAND=address is handwritten
ZIP Address is shown with either 5- or 9-digit ZIP Code
CODE Mailpiece contains a preprinted 11-digit barcode
POST Method of postage // MTR=postage meter STM=postage stamp
CFM Mailpiece contains a CONFIRM barcode
OVNITE Percent on-time for Overnight Mail for PQ 2 FY 2005
2DAY Percent on-time for 2-Day Mail for PQ 2 FY 2005
3DAY Percent on-time for 3-Day Mail for PQ 2 FY 2005

No mailpiece utilizes additional services such as Certified Mail, Registered Mail, COD, or Insured Mail.

All mailpieces are either one ounce or two ounces [other than cards].

DBP/USPS-49 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix II has been completely redacted except for the title, "Description of First-Class Mail Piece Types [EXVC]".

[b] Please advise what EXVC stands for.

[c] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix II contains a listing of the categories [such as length, width, printed or handwritten address, color of mail piece, whether preprinted ZIP Code, Confirm code, etc] that data is provided for to describe the various mail pieces.

[d] Please explain how knowledge of the categories that are referred to in subpart b [as opposed to knowledge of the data for a specific mail piece such as a length of 9 inches] might help an individual identify test pieces.

DBP/USPS-50 Please provide an unredacted version of USPS-LR-L-134 Appendix II.

DBP/USPS-51 Please refer to your response to Interrogatory DBP/USPS-18 subpart c. You have indicated that information that might help an individual identify test pieces has been redacted.

[a] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix IX has been completely redacted except for the title, "Distribution of Priority Mail Packages [PETE]".

[b] Please confirm, or explain if you are unable to confirm, that USPS-LR-L-134 Appendix IX contains a listing of the categories [such as length, width, printed or handwritten address, color of mail piece, whether preprinted ZIP Code, Confirm code, etc] that data is provided for to describe the various mail pieces.

[c] Please explain how knowledge of the categories that are referred to in subpart b [as opposed to knowledge of the data for a specific mail piece such as a length of 9 inches] might help an individual identify test pieces.

[d] Please provide an unredacted copy of Appendix IX.

DBP/USPS-52 Please advise the total number of reporters utilized in the First-Class Mail EXFC program.

DBP/USPS-53 Please advise the total number of reporters utilized in the Priority Mail PETE program.

DBP/USPS-54 [a] Please advise if EXFC and PETE measures performance in every District/Performance Cluster.

[b] If not, please advise the District/Performance Cluster that is not measured [separate listing for EXFC and PETE] , the associated 3-digit ZIP Codes, and the reasons for not including that area.

DBP/USPS-55 [a] Please provide a listing by Area showing the District/Performance Cluster and the 3-digit ZIP Codes [it is not necessary to list ZIP Codes that are not associated with a collection box such as 005, 055, and 102 - however 202-205 should be included] that are not included in the EXFC and PETE programs [separate listing for EXFC and PETE].

[b] Please advise why each of these 3-digit ZIP Codes is not included in the EXFC and PETE program.

[c] Is the listing of 3-digit ZIP Code destination points of test mail the same as the entry points of test mail?

[d] If not, please enumerate and explain.

DBP/USPS-56 [a] Please refer to USPS-LR-L-134 Appendix I and explain why 078 and 079 are shown in the Central New Jersey District when they are now in the Northern New Jersey District?

[b] Please advise if there are any other changes necessary to this listing to account for changes in District responsibilities.

DBP/USPS-57 Please list and discuss the advantages and disadvantages that exist in a ZIP Code area that is included in the EXFC program as opposed to a ZIP Code area that is not included in the EXFC program.

DBP/USPS-58 Please discuss why EXFC mail must be compatible with USPS automation and mechanization equipment.

DBP/USPS-59 [a] Please advise why presorted First-Class Mail is not measured by the EXFC program.

[b] Please advise and provide the reasons for all other categories of First-Class Mail that are not measured by the EXFC program.

[c] Please provide a breakdown of the total number of EXFC reporters utilized for the most recent available time for each of the following address categories:

- [1] Residential City Delivery customer
- [2] Business City Delivery customer
- [3] Post Office Box customer
- [4] General Delivery customer
- [5] Rural Delivery customer
- [6] Highway Contract Delivery customer
- [7] Other [please specify]

[d] For the ZIP Codes that are included in each of the performance clusters that are part of the EXFC program, please provide the total number of delivery points in each of the seven categories shown in subpart c.

[e] Please provide a similar breakdown showing the number of mailpieces received by EXFC reporters during a reporting period in each of the seven categories shown in subpart c.

[f] Same as subpart d except provide the total number of mailpieces received by all addressees in each of the seven categories shown in subpart c.

[g] Please provide the level of confidence the data represents with the use of the number of reporters as shown in subpart c are utilized to measure the data for all of the potential addresses as shown in subpart d and the number of mailpieces shown in subpart e are utilized to measure the total mail volume shown in subpart f. Does the level of confidence change when the individual Performance Cluster data is evaluated? If so, please discuss and explain.

[h] Please provide similar information for the PETE program and the Express Mail program.

[i] Are the number of reporters utilized based on the number of potential addresses in an area or are the number of mailpieces tested based on the total number of mailpieces in the area or both? Please discuss the reasons.

[j] Please discuss the relative percentages of subpart c compared to subpart d and subpart e compared to subpart f as they are spread across the eighty-some Performance Clusters that are in the program. In other words, provide data that shows that all involved Performance Clusters are evaluated equally.

[k] Please discuss and explain any other criteria that are evaluated to ensure equal treatment between Performance Clusters, such as, whether the Performance Cluster does or does not make collections that comply with the Postal Operations Manual.

DBP/USPS-60 The last sentence of Section A.6.4 of USPS-LR-L-134 states that mail pieces indicted in the Caribbean must show a Caribbean return address.

[a] Please explain the reason for this.

[b] Does a similar requirement exist for any other area?

[c] If not, why not?

DBP/USPS-61 Please explain why the same individual can not be both an EXFC dropper and reporter.

DBP/USPS-62 Please provide a copy of the EXFC dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

DBP/USPS-63 Please describe the procedures that are utilized to ensure that the data provided by EXFC droppers is accurate.

DBP/USPS-64 Please refer to the word "prior" appearing as the third word from the end of the 4th line in the first paragraph of Section B.3 of USPS-LR-L-134 and also appearing as the 11th word on the 3rd line of Section D.1.2.

[a] Should this word be changed to "subsequent"?

[b] If not, please provide a discussion of the scenario presented in the 2nd and 3rd sentence of this first paragraph of B.3 and D.1.2 utilizing specific times and days of the week to explain the purpose of these two sentences.

DBP/USPS-65 Please provide a copy of the EXFC reporter instructions referred to in the last sentence of Section C.2 of USPS-LR-L-134.

DBP/USPS-66 [a] Please describe the procedures that are utilized to ensure that the data provided by EXFC reporters is accurate.

[b] Please describe the procedures of how the USPS will independently conduct tests of reporter accuracy as described in Section D.9 of USPS-LR-L-134.

DBP/USPS-67 Please advise why the data shown in Section D.1.3 of USPS-LR-L-134 adds up to a total of 99% rather the 100%.

DBP/USPS-68 With respect to the discussion number of days to deliver as shown in Section D.3 of USPS-LR-L-134, please confirm, or explain if you are unable to confirm, the following:

[a] A letter mailed from New Jersey on Saturday May 27, 2006, to California [normally having a 3-day service standard] and delivered on Tuesday, May 30, 2006 [Monday May 29 was a holiday] will be considered to have been delivered in one day even though it took three calendar days.

[b] Please provide a breakdown for a recent one year period of the percentage of 3-day service standard mail that is delivered in 1-day, 2-days, 3-days, 4-days, and 5+ days utilizing the method of counting days as described in Section D.3.

[c] Please provide a breakdown for a recent one year period of the percentage of 3-day service standard mail that is delivered in 1-calendar day, 2-calendar days, 3-calendar days, 4-calendar days, and 5+ calendar days.

[d] Please provide a breakdown for a recent one year period of the percentage of 2-day service standard mail that is delivered in 1-day, 2-days, 3-days, 4-days, and 5+ days utilizing the method of counting days as described in Section D.3.

[e] Please provide a breakdown for a recent one year period of the percentage of 2-day service standard mail that is delivered in 1-calendar day, 2-calendar days, 3-calendar days, 4-calendar days, and 5+ calendar days.

DBP/USPS-69 With respect to the discussion number of days to deliver as shown in Section D.3 of USPS-LR-L-134, confirm, or explain if you are unable to confirm, that another possible way of counting the number of days to deliver could be to not eliminate non-delivery days if it would result in a delivery time of less than the delivery service standard. For example, overnight and 2-day service standard letters mailed on a Saturday and delivered on the following Monday would be counted as 1-day for the overnight letter and 2-days for the 2-day letter. Another example would be overnight, 2-day, and 3 day letters mailed on a Saturday prior to a Monday holiday and all three are delivered on Tuesday would be counted as 1-day for the overnight letter, 2-days for the 2-day letter, and 3-days for the 3-day letter.

DBP/USPS-70 [a] Please confirm, or explain if you are unable to confirm, that more than 50% of the 2-day service standard mail is delivered in 2-calendar days if a non-delivery day is not involved.

[b] Please confirm, or explain if you are unable to confirm, that more than 50% of the 3-day service standard mail is delivered in 3-calendar days if a non-delivery day is not involved.

[c] Please provide the actual percentages for a recent period.

DBP/USPS-71 [a] Please confirm, or explain if you are unable to confirm, that both the method of counting days provided in Section D.3 of USPS-LR-L-134 and the possible method described in Interrogatory DBP/USPS-69 will introduce a certain amount of inaccuracy due to the effect of non-delivery days.

[b] Please confirm, or explain if you are unable to confirm, that the method of counting days provided in Section D.3 of USPS-LR-L-134 will introduce a greater amount of inaccuracy due to the effect of non-delivery days when compared to the possible method described in Interrogatory DBP/USPS-69 based on the response to Interrogatory DBP/USPS-70.

DBP/USPS-72 Please explain why the EXFC program utilizes the method of counting days provided in Section D.3 of USPS-LR-L-134 as opposed to the possible method described in Interrogatory DBP/USPS-69

DBP/USPS-73 Please explain the method used to count the number of days to deliver in any other program [such as ODIS] that evaluates the number of days to deliver.

DBP/USPS-74 [a] Should the words "one day" appearing on the 4th line of the 4th paragraph of Section D.3 of USPS-LR-L-134 be changed to read "two days"?

[b] If not, please explain.

DBP/USPS-75 Please provide the EXFC data for the past year or more in the format shown in Sections E.1.1 and E.1.2 of USPS-LR-L-134.

DBP/USPS-76 Please refer to Section E.4.3 of USPS-LR-L-134. Please discuss the extent to which the CPMS data is available to the EXFC personnel including, but not limited to, the method of access [hard copy, electronic copy, online access, etc.] the data fields

that are contained in the records, whether it provides all collections at a given collection box or only the last collection time of the day, and the frequency that the data is updated.

DBP/USPS-77 Please refer to Section F.1 of USPS-LR-L-134.

[a] With respect to the EXFC/PETE/Express Mail testing program, please identify the USPS employees or categories of USPS employees [provide the number of employees in that category] that have knowledge of or access to of the identity of droppers/reporters or the proposed location for dropping or receiving mail [prior to the delivery of the mailpiece]?

[b] Please elaborate on the security employed to ensure that other USPS employees do not learn or have access to this information.

[c] Please provide any studies by GAO/OIG/Inspection Service or any other group that evaluates the claimed disclosure of this information or the security to prevent disclosure that have been made in the past 6 years.

DBP/USPS-78 Please refer to Section F.2 of USPS-LR-L-134. Please provide a copy of the latest evaluation of the EXFC program.

DBP/USPS-79 Please provide a copy of the PETE dropper instructions referred to in the last sentence of the first paragraph of Section B.2 of USPS-LR-L-134.

DBP/USPS-80 Please provide a copy of the PETE reporter instructions referred to in the last sentence of the first paragraph of Section C.2 of USPS-LR-L-134.

DBP/USPS-81 [a] May the same individual participate in both the EXFC and PETE programs as either a dropper or reporter?

[b] If not, why not?

DBP/USPS-82 Please provide copies of the latest one year or more report of the Priority Mail performance data.

DBP/USPS-83 [a] What percentage of the EXFC mail pieces that are reported as having been mailed are never reported as having been received?

[b] What percentage of the PETE mail pieces that are reported as having been mailed are never reported as having been received?

[c] Please advise how a mail piece which is reported as having been mailed but is never reported as being received is counted in the EXFC and PETE programs.

DBP/USPS-84 Please advise the specific pages of the appendices that contain redacted material and the nature of the material that has been redacted.

DBP/USPS-85 Please advise the compensation, if any, that is provided to droppers, reporters, and return address panel members in both the EXFC and PETE programs.

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 June 5, 2006
