

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  
SUSAN W. BERKELEY (USPS-T-34) TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T34-1(c)-(d), 2, AND 9)  
(July 7, 2006)

The United States Postal Service hereby provides the responses of  
witness Susan W. Berkeley (USPS-T-34) to interrogatories OCA/USPS-T34-1(c)-  
(d), 2, and 9.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS BERKELEY  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T34-1.** This interrogatory seeks information on the Express Mail delivery guarantee. Please refer to your testimony at page 3, lines 6-8, where it states, "The guarantee is backed by a refund of total postage if delivery does not occur when specified by the Postal Service, with certain exceptions discussed below."

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(c) For FY 2005, please provide the total number of delivery failures for Post Office to Addressee Express Mail, as well as the number of delivery failures separately for Next Day, 2 Day, and the Second Delivery Day.

(d) For FY 2005, please provide the percent of delivery failures to the total volume of Post Office to Addressee Express Mail, as well as the percent of delivery failures separately for Next Day, 2 Day, and the Second Delivery Day.

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**RESPONSE:**

(c) – (d) 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.

<b>FY 05 Express Mail - PO-Addressee</b>	Accepted Volume	On Time Volume	Percent OnTime	Service Failures	% Failed
Express Mail - Next Day 12:00	29,065,520	27,695,373	95.29%	1,370,147	4.7%
Express Mail - Next Day 3:00	9,421,426	8,925,545	94.74%	495,881	5.3%
<b>Total Next Day</b>	<b>38,486,946</b>	<b>36,620,918</b>	<b>95.15%</b>	<b>1,866,028</b>	<b>4.8%</b>
Express Mail - 2 Day 12:00	3,255,075	3,125,912	96.03%	129,163	4.0%
Express Mail - 2 Day 3:00	6,297,177	5,906,985	93.80%	390,192	6.2%
<b>Total 2 - Day</b>	<b>9,552,252</b>	<b>9,032,897</b>	<b>94.56%</b>	<b>519,355</b>	<b>5.4%</b>
Express Mail - 3 Day 12:00	1,730,798	1,694,709	97.91%	36,089	2.1%
Express Mail - 3 Day 3:00	1,058,342	1,024,544	96.81%	33,798	3.2%
<b>Total 3 - Day</b>	<b>2,789,140</b>	<b>2,719,253</b>	<b>97.49%</b>	<b>69,887</b>	<b>2.5%</b>
Express Mail - 4 Day 12:00	823,470	811,393	98.53%	12,077	1.5%
Express Mail - 4 Day 3:00	1,989,818	1,963,552	98.68%	26,266	1.3%
<b>Total 4 -Day</b>	<b>2,813,288</b>	<b>2,774,945</b>	<b>98.64%</b>	<b>38,343</b>	<b>1.4%</b>
<b>Total PO-Addressee Volume</b>	<b>53,641,626</b>	<b>51,148,013</b>	<b>95.35%</b>	<b>2,493,613</b>	<b>4.6%</b>

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T34-2.** This interrogatory seeks information on the Express Mail delivery guarantee. Please refer to your testimony at page 3, lines 6-8. For FY 2005, please provide the total amount of the Postal Service's potential monetary exposure for 1) Post Office to Addressee Express Mail, and 2) separately for Next Day, 2 Day, and the Second Delivery Day, if all customers who experienced delivery failures requested refunds because of the failure to deliver Express Mail by the guaranteed delivery date and time.

**RESPONSE:**

The potential monetary exposure for FY 2005 for Post Office to Addressee is approximately \$38.8 million.

Of this \$38.8 million, the breakdown by days to delivery would be as follows:

Next Day	approximately \$29.1 million
2 Days	approximately \$8.1 million
3 Days	approximately \$1.1 million
4 Days	approximately \$0.6 million

RESPONSE OF POSTAL SERVICE WITNESS BERKELEY  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T34-9.** This interrogatory seeks information on the Express Mail delivery service performance. Please refer to your testimony at page 4, lines 8-10.

(a) For FY 2005, please provide the volume and percent of Post Office to Addressee Express Mail accepted for Next Day 12:00 Noon delivery, Next Day 3:00 PM delivery, 2 Day delivery, and the Second Delivery Day (show separately for 12:00 Noon and 3:00 PM, if it exists).

(b) For FY 2005, please provide the volume and percent of Express Mail that achieved the service commitment referred to in subpart a., above, for which the Express Mail piece was accepted.

**RESPONSE:**

(a) The following data are 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.

FY 2005 Express Mail - PO-Addressee	Accepted Volume	Percent Total
Express Mail - Next Day 12:00	29,065,520	54%
Express Mail - Next Day 3:00	9,421,426	18%
Express Mail - 2 Day 12:00	3,255,075	6%
Express Mail - 2 Day 3:00	6,297,177	12%
Express Mail - 3 Day 12:00	1,730,798	3%
Express Mail - 3 Day 3:00	1,058,342	2%
Express Mail - 4 Day 12:00	823,470	2%
Express Mail - 4 Day 3:00	1,989,818	4%
Total Post Office to Addressee Volume	53,641,626	100%

(b) Please see my response to OCA/USPS-T34-1(c)-(d).