

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-380 and 382)  
(August 7, 2006)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-380 and 382.

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

**DBP/USPS-380.** Please refer to your response to Interrogatory DBP/USPS-161 subpart d.

[a] Please confirm, or explain if you are unable to confirm, that when it is Monday in Guam it will be Sunday on the 48-states side of the International Dateline.

[b] Please confirm, or explain if you are unable to confirm, that if the Express Mail article mailed in Guam on Monday prior to the cut-off time and destined to an area on the 48-states side of the International Dateline was delivered as expeditiously as possible, namely, it was delivered on the next "physical" day, the local date at the point of delivery would be Monday.

[c] Please reevaluate the response to the original subpart d.

**RESPONSE:**

(a) – (c) An adjustment is made to the service commitment for westbound Express Mail pieces to account for the International Dateline, as noted in the response to DBP/USPS-161(c), but not to eastbound Express Mail pieces, as noted in the response to DBP/USPS-161(d). A backwards adjustment is not made because the transportation from Guam does not support such an adjustment.

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**DBP/USPS-382.** Please refer to your response to Interrogatory DBP/USPS-166 subpart b.

[a] Please confirm, or explain if you are unable to confirm, that if an office had a 7 AM cutoff time and the window didn't open until 8 AM, a mailer could not achieve the same level of service for an Express Mail article that would be available if the retail window service started at 6 AM and the mailpiece was deposited between 6 AM and 7 AM.

[b] Please reanswer the original Interrogatory and provide the rationale for your response.

**RESPONSE:**

(a) Confirmed that the service commitment is different for Express Mail pieces accepted before and after a particular cut-off time.

(c) The original interrogatory, which asked about the “deposit” of Express Mail, was answered; thus, there is no need to “reanswer” it.