

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

COMPELLED RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-253 and 254)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-253 and 254, which were compelled by Presiding Officer's Ruling No. R2006-1/63 (September 11, 2006). The interrogatories are stated verbatim and followed by the compelled responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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

DBP/USPS-253

Please provide your best estimate of the percentage of processing facilities that provide overnight First-Class Mail service standards to all of the SCF or 3-digit ZIP Code destinations that have a transit time of three hours or less dock-to-dock and receive 1.5% or more of the originating volume of the facility.

RESPONSE

For the reasons expressed and referenced in its objection and in its reply to the motion to compel, the Postal Service has no empirical basis for estimating this percentage. Short of performing the estimated 3 hours of analysis necessary to review each of 450 mail processing plants and develop a precise estimate of the number that provide overnight First-Class Mail service to all of the possible 932 destinating 3-digit ZIP Code areas that might receive 1.5 percent of the origin's ZIP Code's First-Class Mail, the Postal Service has no basis for determining how good any particular employee's "best guess" of that percentage might be.

Accordingly, the Postal Service considers it imprudent to require any employee, for purposes of this interrogatory, to offer an institutional "best guess" that has no reliable foundation for support.

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

DBP/USPS-254

[a] Please discuss why the “line” between First-Class Mail overnight and 2-day service is not complied with to the same extent as the “line” between 2-day and 3-day service standards is complied with.

[b] Please discuss any plans to improve the level of compliance for the overnight/2-day line.

RESPONSE

(a) If that is so, it is not known why it is so.

(b) This response assumes, perhaps vainly, that the question refers to any non-compliance with the *actual* demarcation between the overnight and two-day service standard definitions, and that the question recognizes that the actual overnight definition does not requires delivery to all 3-digit zones within a 3-hour drive that meet the 1.5 percent volume threshold.

The precise level of systemwide 1-day/2-day demarcation non-compliance is unknown and, therefore, it is not known precisely how it compares to 2-day/3-day demarcation non-compliance. Case-by-case analysis of 1-day/2-day demarcation non-compliance have not been performed.

Service standards are reviewed on a case-by-case basis, as a part of such programs as the Evolutionary Network Development initiative.

These programs present opportunities to analyze any deviations that are and to consider and execute change.