

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-18, 42, 44 and 57)
(April 7, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin:

DBP/USPS-18, compelled by Presiding Officer's Ruling N2006-1/5 (March 31, 2006);

DBP/USPS-42 and 44, filed on February 27, 2006; and

DBP/USPS-57, filed on March 7, 2006.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 7, 2006

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

DBP/USPS-18

Please provide a listing of all processing facilities that have been closed and/or consolidated since the last time the Commission issued a recommended decision for delivery standards.

RESPONSE

Aside from the 11 2005 consolidation decisions identified in USPS Library References N2006-1/5 and N2006-1/6, the following six were made in 2004:

- Steubenville OH SCF 439 originating operation into Youngstown OH P&DC
- West Jersey NJ 07999 originating operation into Dominic Daniel NJ P&DC
- Bronx NY 104 P&DC originating operation into Morgan P&DC NY
- Oil City PA PO 163 destinating operations into Erie PA P&DC 16501
- DuBois PA PO 15801 destinating operation to Johnstown PA P&DF 159
- Bradford PA PO 167 destinating operation to Erie PA P&DC 16501

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

DBP/USPS-42

[a] Please confirm, or explain if you are unable to confirm, that when Plant A is closed and the mail that was previously processed at that plant is now processed at Plant B, that this could affect the final collection and dispatch times [in general, they would become earlier due to the increased travel time] that existed at Plant A's associate offices prior to the consolidation. [b] Please provide the evaluation of this effect on the service standards for each of the eleven reports contained in Library References N2006-1/5 and /6. [c] If this is not being considered, please advise why not.

(a-c) Bearing in mind that local circumstances vary, it is not completely beyond the realm of possibility, under the circumstances sketched out in the question that a determination *could* be made to change some cutoff times. But it is not necessarily the case, as implied by the question, that such changes *would* occur under those circumstances. Only the feasibility study in USPS Library Reference N2006-1/6 involved a plant closing. A review of that study reveals no proposal to change cut-off times. The only consolidation in USPS Library Reference N2006-1/5 that led to a decision to change collection cut-of times was the Olympia WA consolidation. There, 161 of 738 boxes in Olympia had their cut-off times advanced by an hour to 4:00p.m.

It is not known what is meant by an "evaluation of this effect on service standards" in subpart (b).

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

DBP/USPS-44

[a] With respect to consolidations and the desire of some mailers to have a local postmark, what provisions exist for mailers to obtain a local postmark? [b] How is this publicized? [c] Will the conversion in process of the postmarks from the round postmark to the straight-line inkjet postmark have an effect on the ability to provide separate/combined names in the postmark? Please explain. [d] Please provide an updated schedule of the conversion to the straight line inkjet postmarks.

RESPONSE

- (a-b) Consistent with long-standing practice, mailers will retain the option of presenting mail at a local retail window for local postmarking. Efforts are made to publicize this fact if it becomes a material local issue through lobby signage and in direct response to inquiries from the members of the public, elected officials or representatives from print and broadcast news organizations. As deemed appropriate, such information will be transmitted in other communications.
- (c) It is not expected to have an adverse effect.
- (d) Implementation is scheduled for completion by the end of April 2006.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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DBP/USPS-57

Please refer to the attachment to Witness Shah's Testimony as it refers to the standards for First-Class Mail. Please provide the rationale for any existing service standards that do not meet the current policy of the Postal Service as stated.

RESPONSE

There is always the possibility that the service standard for a given 3-digit ZIP Code origin-destination pair could erroneously not be consistent with policy. Otherwise, exceptions from current definitions are sometimes granted. Exceptions were an issue exhaustively covered in Docket No. C2001-3. You are encouraged to review the record in that proceeding, particularly the responses to the following interrogatories and any materials referenced therein:

DBP/USPS-33, 37, 118, 123 and 135; DFC/USPS-GAN-40, 55 and 59;

DFC/USPS-T1-17, 18, 26, 27 and 30; OCA/USPS-T1-2, 3, 4 and 5.