

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-58 AND 59)
(April 24, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin: DBP/USPS-58 and 59, filed on March 14 and 16, 2006, respectively. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov

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

DBP/USPS-58 Assume the following scenario:

1. Plant A has a given level of ZIP Code areas that are overnight, 2-day, and 3-day for First-Class Mail originated within its ZIP Code area.
2. Plant B has an identical listing of overnight, 2-day, and 3 day ZIP Code areas.
3. Plant A is closed and mail from its associated offices is sent to Plant B for processing.

[a] Please confirm, or explain if you are unable to do so, that it may be necessary for associate offices that were previously served by Plant A and are now served by Plant B to make an earlier dispatch of their mail. [b] Please provide a listing of those scenarios that could result in requiring the earlier dispatch as noted in subpart a. [c] Please confirm, or explain if you are unable to do so, that if an associate office in the area formerly served by Plant A was required to make an earlier dispatch as a result of the consolidation, it could result in earlier collection times at one or more blue collection boxes at that office or earlier cutoffs for mail deposited in the lobby drop or over the retail window. [d] Please provide any other possible changes that might be required in addition to those listed in subpart c. [e] Please confirm, or explain if you are unable to do so, that if, for example, it became necessary to change the final collection time at a blue collection box at the associate office previously served by Plant A from 6 PM to 5 PM that this would result in a reduction of the level of service provided to the customers of that office even though the ZIP Code areas of the overnight, 2-day, and 3-day First-Class Mail were still the same. [f] Please confirm, or explain if you are unable to do so, that other classes of mail could be equally effected as First-Class Mail.

RESPONSE

- (a-b) Such a necessity could develop in some locations, but it is impossible to provide you with a list of all such possible scenarios.
- (c) Confirmed.
- (d) This is your hypothetical. Whatever other changes *might be required* would depend on all the parameters involved.
- (e) Whether such a change had a material impact on customers would depend on their specific circumstances. Some mailers could regard such a change has having little or no impact on their ability to drop off mail for collection and processing that day. Some mailers could easily adjust to meet the new deadline. For others, the adjustment might require more effort. Some mailers may find that they are not able to finalize all of their mail for drop-off by the earlier collection time. No doubt, to some degree, some mailers might regard such a change to be a reduction in service.
- (f) No mail class has anywhere near as high a percentage of induction through collection boxes. Accordingly, the Postal Service is hesitant to confirm that

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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RESPONSE to DBP/USPS-58 (continued):

collection box changes of the sort discussed in this interrogatory will affect those mail classes to the same degree as First-Class Mail.

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

DBP/USPS-59

[a] Please confirm, or explain if you are unable to do so, that in the name of Retail Standardization, that the Postal Service has changed the time by which box mail must be placed in the box for delivery to the boxholder to 11 AM. [b] Please confirm, or explain if you are unable to do so, that for those post office box holders that previously had a time prior to 11 AM this would represent a reduction in service. [c] Please explain the reasons behind this reduction in service as noted in subpart b. [d] Please explain the effect that the consolidation of processing plants has resulted in a later arrival of incoming mail at the associate offices of the closed plant and the extent that this would require the later time of box mail availability.

RESPONSE

- (a) Not confirmed. No such national standard has been established.
- (b) Some customers accustomed to their mail in their boxes at some time earlier than 11am might consider that their service had been reduced by the establishment of your 11am standard, irrespective of what time their mail actually appeared in their boxes after the establishment of such a standard.
- (c) See the response to subpart (a).
- (d) No such impact has yet been reported.