

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-12 THROUGH 16**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated December 15, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
December 22, 2011

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

DBP/USPS-12 This Interrogatory is designed to show the combined results of the outstanding Postal Service requests.

Assume that I am a customer of a facility that is convenient for me to mail a letter prior to the weekday dispatch of 4 PM and this office is closed and that as replacement I now receive delivery service on a rural route operating from a neighboring post office and the carrier passes my house at 2 PM,

Scenario #1 = I have a First-Class Mail letter destined to a neighboring town [presently in the overnight service area] that is ready to mail at 3 PM on Wednesday. Under the existing conditions, I walk over to my local post office and the letter is dispatched at 4 PM Wednesday and delivered on Thursday.

Under the combined effects of the outstanding USPS requests, I place the letter in the rural box at my curb at the same 3 PM Wednesday. The carrier will pick up the letter at 2 PM Thursday and bring it back to the new facility for dispatch. The letter will now be scheduled for 2-day standard for delivery on Saturday. Since Saturday delivery has been eliminated, the letter will be delivered Monday which is four days after the existing conditions [If there is a Monday holiday it would be delivered Tuesday or five days after the existing conditions].

Scenario #2 = I have a First-Class Mail letter destined to a location some 400 miles away [presently in the 2-day service area and proposed for 3-day delivery] that is ready to mail at 3 PM on Tuesday. Under the existing conditions, I walk over to my local post office and the letter is dispatched at 4 PM Tuesday and delivered on Thursday.

Under the combined effects of the outstanding USPS requests, I place the letter in the rural box at my curb at the same 3 PM Tuesday. The carrier will pick up the letter at 2 PM Wednesday and bring it back to the new facility for dispatch. The letter will now be scheduled for 3-day standard for delivery on Saturday. Since Saturday delivery has been eliminated, the letter will be delivered Monday which is four days after the existing conditions [If there is a Monday holiday it would be delivered Tuesday or five days after the existing conditions].

Please confirm the above scenarios or explain if you are unable to confirm.

RESPONSE

Rather than asking that the elimination of Saturday street delivery be assumed for hypothetical purposes, this interrogatory improperly characterizes such delivery (the subject of Docket No. N2010-1) as having been eliminated. Accordingly, on that basis, neither Scenario can be confirmed.

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

RESPONSE to DBP/USPS-12 (continued)

The interrogatory Scenarios do establish that, if one strings together the potential adverse effects of combinations of service changes, entry of mail after the opportunity for pick-up, no mitigating change in behavior by the mailer, and all possible gaps in delivery occasioned by all possible intervening non-delivery days (current and hypothetical) and holidays, some mail with a two-day service standard might not be delivered until five days after entry in a hypothetically constructed operating environment.

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

DBP/USPS-13 Are there any ZIP Code pairs that presently have a 3-day delivery standard for First-Class Mail that under the proposed standards would have a 2-day delivery standard and if so, please enumerate them?

RESPONSE

The actual service changes cannot be known until the final service standard regulation business rule changes are adopted and all of the Area Mail Processing operational consolidations associated with the initiative under review in this docket are determined. Nevertheless, utilizing the potential changes depicted in USPS Library Reference N2012-1/8 for illustrative purposes, it is conceivable that 84 3-digit ZIP Code pairs could go from 3-day to 2-day. They are as follows:

OZIP	DZIP
577	820
577	823
577	824
577	825
577	826
577	827
598	988
598	989
599	988
599	989
739	881
739	882
793	739
794	739
808	690
808	691
808	692
808	693
809	690
809	691
809	692
809	693
810	690
810	691
810	692
810	693
811	690
811	691
811	692
811	693
812	690
812	691

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

812	692
812	693
820	577
820	677
822	577
822	677
823	577
823	677
824	577
825	577
826	577
827	577
829	832
829	834
830	832
830	834
831	832
831	834
832	829
832	830
832	831
834	829
834	830
834	831
881	739
881	769
881	790
881	791
881	792
881	793
881	794
881	795
881	796
881	797
882	739
882	769
882	790
882	791
882	792
882	793
882	794
882	795
882	796
882	797
955	975
955	976
975	955
976	955
988	598
988	599
989	598
989	599

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

DBP/USPS-14

- [a] It is proposed to have a four hour drive time from the originating facility to the destinating SCF for a 2-day delivery standard for First-Class Mail. If the drive time is exactly four hours, will that have a 2-day or 3-day delivery standard?
- [b] Will that dividing line as noted in subpart [a] between 2-day and 3-day delivery standards for First-Class Mail be applied consistently throughout the contiguous 48 states? If not, please provide details of the ZIP Code pairs along with an explanation of the reasons why certain ZIP Code pairs will either not meet the criteria or exceed it.

RESPONSE

- (a) Two.
- (b) That is the plan.

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

DBP/USPS-15

[a] For each of the following processing facilities, please provide a listing of those SCF destinating locations that are within a four hour drive time from the originating facility:

1. New York NY Morgan 100
2. Teterboro NJ NNJ Metro 076
3. Kearny NJ DVD 070

The listing should show the drive time for each of the facilities that are on the list in addition to the name of the SCF.

[b] For each SCF that is listed one or more times in the response to subpart [a], please provide the 3-digit ZIP Codes that are included in the given SCF.

[c] Will the responses to subpart [b] change as consolidation of processing plants takes place and if so, will the new facilities location be the replacement SCF?

RESPONSE

(a & b)

ORIGIN PROCESSING FACILITY	SCF	Drive Time (hours)	SCF ZIP CODES
NEW YORK NY 100	SCF SPRINGFIELD MA 010	3.20	010-013
NEW YORK NY 100	SCF HARTFORD CT 060	2.66	060-063
NEW YORK NY 100	SCF SOUTHERN CT 064	2.13	064, 065, 067
NEW YORK NY 100	SCF STAMFORD CT 068	1.04	066, 068, 069
NEW YORK NY 100	SCF DV DANIELS NJ 070	0.68	070-073
NEW YORK NY 100	SCF NNJ METRO NJ 076	0.43	074-076, 078
NEW YORK NY 100	MONMOUTH NJ 077	1.21	077
NEW YORK NY 100	SCF SOUTH JERSEY NJ 080	2.08	080-084
NEW YORK NY 100	SCF TRENTON NJ 085	1.63	085-087
NEW YORK NY 100	SCF KILMER NJ 088	0.75	079, 088, 089
NEW YORK NY 100	SCF NEW YORK NY 100	0.00	100-102, 104
NEW YORK NY 100	STATEN ISLAND NY 103	0.47	103
NEW YORK NY 100	SCF WESTCHESTER NY 105	0.70	105-109
NEW YORK NY 100	SCF BROOKLYN NY 112	0.29	112, 116
NEW YORK NY 100	SCF QUEENS NY 110	0.26	110, 111, 113, 114
NEW YORK NY 100	WESTERN NASSAU NY 115	0.51	115
NEW YORK NY 100	SCF MID-ISLAND NY 117	0.76	005, 117-119
NEW YORK NY 100	SCF ALBANY NY 120	3.45	120-123
NEW YORK NY 100	SCF MID-HUDSON NY 125	1.77	124-127
NEW YORK NY 100	SCF LANCASTER PA 175	3.62	174-176
NEW YORK NY 100	SCF LEHIGH VALLEY PA 180	2.19	180-183
NEW YORK NY 100	SCF SCRANTON PA 184	2.88	184-188
NEW YORK NY 100	SCF PHILADELPHIA PA	2.12	190-192

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

	190		
NEW YORK NY 100	SCF SOUTHEASTERN PA 189	2.73	189, 193, 194
NEW YORK NY 100	SCF READING PA 195	3.25	179, 195, 196
NEW YORK NY 100	SCF WILMINGTON DE 197	2.74	197-199
NORTHERN NJ METRO 076	SCF SPRINGFIELD MA 010	3.07	010-013
NORTHERN NJ METRO 076	SCF CENTRAL MA 015	3.91	014-017
NORTHERN NJ METRO 076	SCF PROVIDENCE RI 028	3.89	027-029
NORTHERN NJ METRO 076	SCF HARTFORD CT 060	2.53	060-063
NORTHERN NJ METRO 076	SCF SOUTHERN CT 064	2.00	064, 065, 067
NORTHERN NJ METRO 076	SCF STAMFORD CT 068	0.91	066, 068, 069
NORTHERN NJ METRO 076	SCF DV DANIELS NJ 070	0.36	070-073
NORTHERN NJ METRO 076	SCF NNJ METRO NJ 076	0.00	074-076, 078
NORTHERN NJ METRO 076	MONMOUTH NJ 077	1.18	077
NORTHERN NJ METRO 076	SCF SOUTH JERSEY NJ 080	2.05	080-084
NORTHERN NJ METRO 076	SCF TRENTON NJ 085	1.59	085-087
NORTHERN NJ METRO 076	SCF KILMER NJ 088	0.72	079, 088, 089
NORTHERN NJ METRO 076	SCF NEW YORK NY 100	0.40	100-102, 104
NORTHERN NJ METRO 076	STATEN ISLAND NY 103	0.61	103
NORTHERN NJ METRO 076	SCF WESTCHESTER NY 105	0.67	105-109
NORTHERN NJ METRO 076	SCF BROOKLYN NY 112	0.72	112, 116
NORTHERN NJ METRO 076	SCF QUEENS NY 110	0.47	110, 111, 113, 114
NORTHERN NJ METRO 076	WESTERN NASSAU NY 115	0.68	115
NORTHERN NJ METRO 076	SCF MID-ISLAND NY 117	0.94	005, 117-119
NORTHERN NJ METRO 076	SCF ALBANY NY 120	2.95	120-123
NORTHERN NJ METRO 076	SCF MID-HUDSON NY 125	1.27	124-127
NORTHERN NJ METRO 076	SCF BINGHAMTON NY 137	3.71	137-139
NORTHERN NJ METRO 076	SCF HARRISBURG PA 170	3.76	170-173, 178
NORTHERN NJ METRO 076	SCF LANCASTER PA 175	3.59	174-176
NORTHERN NJ METRO 076	SCF LEHIGH VALLEY PA 180	1.93	180-183
NORTHERN NJ METRO 076	SCF SCRANTON PA 184	2.49	184-188
NORTHERN NJ METRO 076	SCF PHILADELPHIA PA 190	2.08	190-192
NORTHERN NJ METRO 076	SCF SOUTHEASTERN PA 189	2.70	189, 193, 194
NORTHERN NJ METRO 076	SCF READING PA 195	3.08	179, 195, 196
NORTHERN NJ METRO 076	SCF WILMINGTON DE 197	2.71	197-199
DV DANIALS NJ 07099	SCF SPRINGFIELD MA 010	3.33	010-013
DV DANIALS NJ 07099	SCF HARTFORD CT 060	2.79	060-063
DV DANIALS NJ 07099	SCF SOUTHERN CT 064	2.26	064, 065, 067
DV DANIALS NJ 07099	SCF STAMFORD CT 068	1.17	066, 068, 069
DV DANIALS NJ 07099	SCF DV DANIELS NJ 070	0.00	070-073
DV DANIALS NJ 07099	SCF NNJ METRO NJ 076	0.43	074-076, 078
DV DANIALS NJ 07099	MONMOUTH NJ 077	1.07	077
DV DANIALS NJ 07099	SCF SOUTH JERSEY NJ 080	1.94	080-084
DV DANIALS NJ 07099	SCF TRENTON NJ 085	1.48	085-087
DV DANIALS NJ 07099	SCF KILMER NJ 088	0.61	079, 088, 089
DV DANIALS NJ 07099	SCF NEW YORK NY 100	0.66	100-102, 104
DV DANIALS NJ 07099	STATEN ISLAND NY 103	0.50	103
DV DANIALS NJ 07099	SCF WESTCHESTER NY 105	0.93	105-109
DV DANIALS NJ 07099	SCF BROOKLYN NY 112	0.86	112, 116
DV DANIALS NJ 07099	SCF QUEENS NY 110	0.73	110, 111, 113,

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

			114
DV DANIALS NJ 07099	WESTERN NASSAU NY 115	0.94	115
DV DANIALS NJ 07099	SCF MID-ISLAND NY 117	1.20	005, 117-119
DV DANIALS NJ 07099	SCF ALBANY NY 120	3.42	120-123
DV DANIALS NJ 07099	SCF MID-HUDSON NY 125	1.74	124-127
DV DANIALS NJ 07099	SCF BINGHAMTON NY 137	3.63	137-139
DV DANIALS NJ 07099	SCF HARRISBURG PA 170	3.68	170-173, 178
DV DANIALS NJ 07099	SCF LANCASTER PA 175	3.48	174-176
DV DANIALS NJ 07099	SCF LEHIGH VALLEY PA 180	1.85	180-183
DV DANIALS NJ 07099	SCF SCRANTON PA 184	2.42	184-188
DV DANIALS NJ 07099	SCF PHILADELPHIA PA 190	1.97	190-192
DV DANIALS NJ 07099	SCF SOUTHEASTERN PA 189	2.59	189, 193, 194
DV DANIALS NJ 07099	SCF READING PA 195	3.01	179, 195, 196
DV DANIALS NJ 07099	SCF WILMINGTON DE 197	2.60	197-199

(c) Yes. Yes.

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

DBP/USPS-16 Does the current Docket contemplate any changes to Part 3 of the Postal Operations Manual as it relates to collection services? If so, please provide details.

RESPONSE

The Postal Service is examining whether the operational and service changes within the scope of this docket will require changes in the Postal Operations Manual (POM). As determinations are made to amend current POM provisions, the POM will be revised.