

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

RECEIVED

MAR 2 4 43 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
DOUGLAS F. CARLSON
(DFC/USPS-39, 41, 43, 46-49)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson: DFC/USPS-39, 41, 43, 46-49, filed on February 17, 2000. Objections to interrogatories DFC/USPS-38-39, 42-45 were filed on February 28, 2000, and by providing the attached responses to Nos. 39 and 43, the Postal Service does not waive its objection to those questions or any potential follow-up questions. Interrogatory DFC/USPS-40 was redirected to witness Mayes. Responses to the other questions (Nos. 36-37) from this same set were filed previously.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
March 2, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-39 Please refer to the response to DFC/USPS-7 and explain why Sunday processing would not have any "direct impact on service standards for First Class Mail." Are you suggesting that letters deposited on Sunday at a facility that processes outgoing mail on Sundays will not be delivered on Monday for destinations located within the designated overnight delivery area, on Tuesday for destinations located within the designated two-day delivery area, or on Wednesday for destinations located within the designated three-day delivery area? If so, please provide documents and details to support this position.

Response:

This question appears to address the issue of actual delivery, while the quoted statement from the response to DFC/USPS-7 was discussing service *standards*. In the limited instances where collection mail is processed on Sundays (e.g. Christmas season), the service *standard* of that mail would be the same as if it were collected and processed on Monday. Mail collected and processed on Sundays in such instances maintains an overnight delivery standard of Tuesday, a two-day standard of Wednesday, and a three-day standard of Thursday.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-41

- a. Please confirm that Express Mail is delivered on Sundays nationwide. If you do not confirm, please explain.
- b. Does Sunday delivery of Express Mail justify a higher cost coverage for Express Mail than if Express Mail were not delivered on Sundays? Please explain.
- c. Please discuss the extent to which P&DC's accept Express Mail from customers on Sundays and process and dispatch the Express Mail on Sundays.
- d. Please discuss the extent to which customers may tender Express Mail on Sundays at staffed post offices and have this Express Mail dispatched on Sunday.
- e. Please discuss the extent to which P&DC's accept Priority Mail from customers on Sundays and process and dispatch the Priority Mail on Sundays.
- f. Please discuss the extent to which customers may tender Priority Mail on Sundays at staffed post offices and have this Priority Mail dispatched on Sunday.
- g. Please confirm that the ability of customers to tender Express Mail at some postal facilities on Sundays and have this Express Mail processed and dispatched on Sunday raises the value of Express Mail as compared to other classes of mail that will not be processed and dispatched on Sunday.
- h. Please confirm that the ability of customers to tender Priority Mail at some postal facilities on Sundays and have this Priority Mail processed and dispatched on Sunday raises the value of Priority Mail as compared to other classes of mail that will not be processed and dispatched on Sunday.

Response:

- a. Confirmed.
- b. Under conventional analysis, Sunday delivery of Express Mail suggests a higher evaluation on Criterion 2, value of service, than if Express Mail were not delivered on Sunday. Of course, this is only one of many factors that need to be considered in the context of Criterion 2, so its relative weight in

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

that process cannot be determined in isolation. Moreover, Criterion 2 is only one of many criteria that must be balanced when developing rates.

Therefore, it is not possible to reach the conclusion that Sunday delivery, by itself, would "justify a higher cost coverage for Express Mail."

- c. The Postal Service accepts Express Mail at P&DCs only to the extent that acceptance personnel are staffed and a tendering location exists. However, data are not available regarding the extent to which Express Mail is accepted from customers at P&DCs on Sundays. Express Mail is processed and dispatched on Sundays.
- d. Data are not available regarding the extent to which Express Mail is tendered to staffed post offices on Sundays. Very few post offices, however, are staffed on Sundays. Express Mail is processed and dispatched on Sundays.
- e. The Postal Service accepts Priority Mail at P&DCs only to the extent that acceptance personnel are staffed and a tendering location exists. However, data are not available regarding the extent to which Priority Mail is accepted from customers at P&DCs on Sundays. The national policy is that there is no commitment to process and dispatch Priority Mail on Sundays.
- f. Data are not available regarding the extent to which Priority Mail is tendered to staffed post offices on Sundays. Very few post offices, however, are staffed on Sundays. The national policy is that there is no commitment to process and dispatch Priority Mail on Sundays.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

- g. The Postal Service can confirm that this raises the value of Express Mail in terms of service. See the response to subpart b. above.
- h. Not confirmed. As stated in subpart e. above, customers should have no expectations that Priority Mail will be processed and dispatched on Sundays. With respect to Sunday processing and dispatch, the value of service provided Priority Mail is the same as that provided all other subclasses of mail, except for Express Mail.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-43 Please refer to your response to DFC/USPS-6(b). Please state the basis for this response and provide any policies, guidelines, or directives that exist on this subject.

Response.

The response was based on consultation with personnel in Postal operations with substantial amounts of relevant experience. A search was conducted for national policies, guidelines, or directives on this subject, but none have been identified.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-46

Please describe the meaning and use of FIM "D".

RESPONSE:

A Facing Identification Mark (FIM) is a series of vertical bars used by automated postal equipment that identifies, orients, and separates business reply mail, courtesy reply mail, and official mail. These bars are positioned in the upper right corner of the mail piece to the left of the indicia (area reserved for postage). They serve as an orientation mark for automated facing and canceling equipment. FIM "D" is one of four configurations of vertical bars employed by the Postal Service. It currently is used to identify mail pieces whose indicia are generated by any of the newly-approved Internet-Based Indicia (IBI) postage products.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO THE INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-47

- a. Please describe the meaning and function of performance clusters.
- b. Please provide a list of all the performance clusters and the administrative and functional units (e.g., districts, P&DC's, etc.) contained therein.

Response:

- a. Performance Clusters have the same geographic boundaries as districts and include the customer service functions, mail processing plants (P&DCs, P&DFs), most of the AMCs and BMCs located within the boundaries and support functions such as Finance, Human Resources, and Address Management. Performance Clusters are part of the management structure and report to the Areas.
- b. See attached list. As you can see, some of the facilities report directly to the area offices.

INSTALLATION LIST BY CLUSTER

CUSTER NAME	FACILITY NAME
AKRON OH	AKRON P&DC
AKRON OH	TOLEDO P&DF
ALABAMA	BIRMINGHAM P&DC
ALABAMA	HUNTSVILLE P&DF
ALABAMA	MOBILE P&DC
ALABAMA	MONTGOMERY P&DC
ALABAMA	BIRMINGHAM AMF
ALASKA	ANCHORAGE P&DC
ALASKA	ANCHORAGE AMF
ALBANY NY	ALBANY P&DC
ALBANY NY	BINGHAMTON P&DF
ALBANY NY	SYRACUSE P&DC
ALBANY NY	UTICA P&DF
ALBUQUERQUE NM	ALBUQUERQUE P&DC
ALBUQUERQUE NM	ALBUQUERQUE AMF
APPALACHIAN	CHARLESTON P&DC
APPALACHIAN	CLARKSBURG P&DF
APPALACHIAN	HUNTINGTON P&DF
APPALACHIAN	LYNCHBURG P&DF
APPALACHIAN	ROANOKE P&DC
ARIZONA	PHOENIX P&DC
ARIZONA	TUCSON P&DC
ARIZONA	PHOENIX AMC
ARKANSAS	LITTLE ROCK P&DC
ATLANTA GA	ATLANTA P&DC
ATLANTA GA	NORTH METRO
ATLANTA GA	ATLANTA AMC
BALTIMORE MD	BALT INC MAIL P&DF
BALTIMORE MD	BALTIMORE P&DC
BALTIMORE MD	EASTON P&DF
BALTIMORE MD	FREDERICK P&DF
BALTIMORE MD	BALTIMORE AMC
BIG SKY	BILLINGS P&DC
BOSTON MA	BOSTON P&DC
BOSTON MA	NORTHWEST BOSTON P&DC
BOSTON MA	BOSTON AMC
CAPITAL	SO MARYLAND P&DC
CAPITAL	SUBURBAN MD P&DC
CAPITAL	WASHINGTON P&DC
CAPITAL	WASHINGTON, DC AMC
CAPITAL	WASHINGTON BMC
CARIBBEAN	SAN JUAN P&DC
CARIBBEAN	SAN JUAN AMF
CENTRAL FLORIDA	MID FLORIDA P&DC
CENTRAL FLORIDA	ORLANDO P&DC
CENTRAL FLORIDA	WEST PALM BEACH P&DC
CENTRAL ILLINOIS	BLOOMINGTON P&DF
CENTRAL ILLINOIS	CHAMPAIGN P&DF
CENTRAL ILLINOIS	FOX VALLEY P&DC
CENTRAL ILLINOIS	PEORIA P&DF
CENTRAL ILLINOIS	SOUTH SUBURBAN P&DC
CENTRAL ILLINOIS	SPRINGFIELD P&DC
CENTRAL ILLINOIS	CHICAGO BMC
CENTRAL NEW JERSEY	KILMER P&DC
CENTRAL NEW JERSEY	MONMOUTH P&DC
CENTRAL NEW JERSEY	TRENTON P&DC
CENTRAL NEW JERSEY	WEST JERSEY P&DC
CENTRAL PLAINS	GRAND ISLAND P&DF
CENTRAL PLAINS	LINCOLN P&DF
CENTRAL PLAINS	NORFOLK P&DF
CENTRAL PLAINS	OMAHA P&DC
CENTRAL PLAINS	TOPEKA P&DF

INSTALLATION LIST BY CLUSTER

	CUSTER NAME	FACILITY NAME
	CENTRAL PLAINS	WICHITA P&DC
	CENTRAL PLAINS	OMAHA AMF
	CHICAGO IL	CHICAGO P&DC
	CHICAGO IL	IRVING PARK RD P&DC
	CHICAGO IL	SGR HOUSE/CHICAGOP&DC
	CINCINNATI OH	CINCINNATI P&DC
	CINCINNATI OH	CINCINNATI P&DC-1
	CINCINNATI OH	DAYTON P&DF
	CINCINNATI OH	CINCINNATI AMF
	CINCINNATI OH	DAYTON AMF
	CINCINNATI OH	CINCINNATI BMF
	CLEVELAND OH	CLEVELAND P&DC
	CLEVELAND OH	CLEVELAND AMF
	COLORADO/WYOMING	CHEYENNE P&DC
	COLORADO/WYOMING	COLORADO SPRINGS P&DC
	COLORADO/WYOMING	DENVER P&DC
	COLORADO/WYOMING	DENVER AMC
	COLUMBUS OH	COLUMBUS P&DC
	COLUMBUS OH	COLUMBUS P&DC-1
	COLUMBUS OH	COLUMBUS AMF
	CONNECTICUT	BRIDGEPORT P&DF
	CONNECTICUT	HARTFORD P&DC
	CONNECTICUT	SOUTHERN CT P&DC
	CONNECTICUT	STAMFORD P&DC
	CONNECTICUT	WATERBURY P&DF
	CONNECTICUT	WESTERN CT P&DC
	CONNECTICUT	BRADLEY AMF
	DALLAS TX	DALLAS P&DC
	DALLAS TX	EAST TEXAS P&DC
	DALLAS TX	NORTH TEXAS P&DC
	DETROIT MI	DETROIT P&DC
	DETROIT MI	DETROIT AMC
	DETROIT MI	DETROIT BMC
	FORT WORTH TX	AMARILLO P&DF
	FORT WORTH TX	FT WORTH P&DC
	FORT WORTH TX	LUBBOCK P&DF
	GATEWAY	COLUMBIA MO P&DF
	GATEWAY	ST LOUIS MO P&DC
	GATEWAY	ST LOUIS MO AMC
	GATEWAY	ST LOUIS BMC
	GREATER INDIANA	FT WAYNE P&DC
	GREATER INDIANA	GARY P&DC
	GREATER INDIANA	INDIANAPOLIS P & DF
	GREATER INDIANA	INDIANAPOLIS P&DC
	GREATER INDIANA	KOKOMO P&DF
	GREATER INDIANA	LAFAYETTE P&DF
	GREATER INDIANA	MUNCIE P&DF
	GREATER INDIANA	SOUTH BEND P&DC
	GREATER INDIANA	TERRE HAUTE P&DF
	GREATER INDIANA	INDIANAPOLIS AMC
	GREATER MICHIGAN	GRAND RAPIDS P&DC
	GREATER MICHIGAN	KALAMAZOO P&DC
	GREATER MICHIGAN	LANSING P&DC
	GREATER MICHIGAN	SAGINAW P&DC
	GREATER MICHIGAN	TRAVERSE CITY P&DF
	GREATER MICHIGAN	GRAND RAPIDS AMF
	GREATER SO CAROLINA	CHARLESTON P&DF
	GREATER SO CAROLINA	COLUMBIA P&DC
	GREATER SO CAROLINA	FLORENCE P&DF
	GREATER SO CAROLINA	GREENVILLE P&DC
	GREATER SO CAROLINA	COLUMBIA AMF
	GREATER SO CAROLINA	GREENVILLE AMF

INSTALLATION LIST BY CLUSTER

	CUSTER NAME	FACILITY NAME
	GREENSBORO NC	GREENSBORO P&DC
	GREENSBORO NC	HICKORY P&DF
	GREENSBORO NC	RALEIGH P&DC
	GREENSBORO NC	ROCKY MOUNT P&DF
	GREENSBORO NC	GREENSBORO AMC
	GREENSBORO NC	RALEIGH AMC
	HARRISBURG PA	HARRISBURG P&DC
	HARRISBURG PA	KEYSTONE P&DF
	HARRISBURG PA	LEHIGH VALLEY P&DC
	HAWKEYE	DES MOINES P&DC
	HAWKEYE	QUAD CITIES P&DF
	HAWKEYE	DES MOINES BMC
	HONOLULU HI	HONOLULU P&DC
	HOUSTON TX	BEAUMONT P&DF
	HOUSTON TX	HOUSTON P&DC
	HOUSTON TX	N HOUSTON P&DC
	HOUSTON TX	HOUSTON AMC
	KENTUCKIANA	ASHLAND P&DF
	KENTUCKIANA	BOWLING GREEN P&DF
	KENTUCKIANA	EVANSVILLE P&DF
	KENTUCKIANA	LEXINGTON P&DC
	KENTUCKIANA	LONDON P&DF
	KENTUCKIANA	LOUISVILLE P&DC
	KENTUCKIANA	PADUCAH P&DF
	KENTUCKIANA	LOUISVILLE AMF
	LAKELAND	GREEN BAY P&DC
	LAKELAND	MADISON P&DC
	LAKELAND	MILWAUKEE P&DC
	LAKELAND	OSHKOSH P&DF
	LAKELAND	WAUSAU P&DF
	LAKELAND	MILWAUKEE WI AMC
	LANCASTER PA	LANCASTER P&DC
	LANCASTER PA	READING P&DF
	LANCASTER PA	SOUTHEASTERN P&DC
	LAS VEGAS NV	LAS VEGAS P&DC
	LAS VEGAS NV	RENO P&DC
	LAS VEGAS NV	LAS VEGAS NV AMC
	LAS VEGAS NV	RENO AMF
	LONG BEACH CA	LONG BEACH P&DC
	LONG BEACH CA	MARINA P&DC
	LONG ISLAND NY	MID-ISLAND P&DC
	LONG ISLAND NY	WEST NASSAU P&DC
	LOS ANGELES CA	LOS ANGELES P&DC
	LOS ANGELES CA	WORLDWAY AMC
	LOS ANGELES CA	LOS ANGELES BMC
	LOS ANGELES CA	LA INTL SVC CTR
	LOUISIANA	BATON ROUGE P&DC
	LOUISIANA	NEW ORLEANS P&DC
	LOUISIANA	SHREVEPORT P&DC
	LOUISIANA	NEW ORLEANS AMC
	MAINE	BANGOR P&DF
	MAINE	PORTLAND P&DC
	MID-AMERICA	KCKS P&DC
	MID-AMERICA	KCMO P&DC
	MID-AMERICA	KCMO AMC
	MID-AMERICA	KCKS BMC
	MID-CAROLINAS	ASHEVILLE P&DF
	MID-CAROLINAS	CHARLOTTE P&DC
	MID-CAROLINAS	FAYETTEVILLE P&DC
	MID-CAROLINAS	KINSTON P&DF
	MID-CAROLINAS	CHARLOTTE AMC
	MIDDLESEX-CENTRAL	MIDDLESEX-ESSEX P&DC

INSTALLATION LIST BY CLUSTER

CUSTER NAME	FACILITY NAME
MIDDLESEX-CENTRAL	WORCESTER P&DC
MIDDLESEX-CENTRAL	NORTHERN HASP FAC
MISSISSIPPI	GULFPORT P&DF
MISSISSIPPI	JACKSON P&DC
NEW HAMPSHIRE	MANCHESTER P&DC
NEW HAMPSHIRE	PORTSMOUTH P&DF
NEW YORK CITY	BRONX P&DC
NEW YORK CITY	CHURCH ST P&DC
NEW YORK CITY	J A FARLEY P&DC
NEW YORK CITY	NEW YORK MORGAN P&DC
NORTH FLORIDA	DAYTONA BCH P&DF
NORTH FLORIDA	GAINESVILLE P&DF
NORTH FLORIDA	JACKSONVILLE P&DC
NORTH FLORIDA	PANAMA CITY P&DF
NORTH FLORIDA	PENSACOLA P&DC
NORTH FLORIDA	TALLAHASSE P&DF
NORTH FLORIDA	JACKSONVILLE FL AMF
NORTHERN ILLINOIS	CAROL STREAM P&DC
NORTHERN ILLINOIS	PALATINE P&DC
NORTHERN ILLINOIS	ROCKFORD P&DC
NORTHERN NEW JERSEY	DVD BLDG P&DC
NORTHERN NEW JERSEY	HACKENSACK P&DC
NORTHERN NEW JERSEY	PATERSON P&DC
NORTHERN NEW JERSEY	NEWARK AMC
NORTHERN VIRGINIA	DULLES P&DC
NORTHERN VIRGINIA	NORTHERN VA P&DC
NORTHERN VIRGINIA	WASHINGTON-DULLES AMC
NORTHLAND	DULUTH P&DF
NORTHLAND	EAU CLAIRE P&DF
NORTHLAND	MINNEAPOLIS P&DC
NORTHLAND	SAINT PAUL P&DC
NORTHLAND	TWIN CITIES MN AMC
NORTHLAND	MINN-SAINT PAUL BMC
OAKLAND CA	OAKLAND INTL MAIL OPN
OAKLAND CA	OAKLAND P&DC
OAKLAND CA	OAKLAND AMF
OAKLAND CA	SAN FRANCISCO BMC
OAKLAND CA	OAKLAND ISF
OKLAHOMA	OKLAHOMA CITY P&DC
OKLAHOMA	TULSA P&DC
OKLAHOMA	OKLAHOMA AMF
OKLAHOMA	TULSA AMF
PHILADELPHIA PA	PHILADELPHIA P&DC
PHILADELPHIA PA	PHILADELPHIA P&DC-1
PHILADELPHIA PA	PHILADELPHIA AMF
PHILADELPHIA PA	PHILADELPHIA BMF
PITTSBURGH PA	PITTSBURGH P&DC
PITTSBURGH PA	PITTSBURGH AMF
PITTSBURGH PA	PITTSBURGH BMF
PORTLAND OR	EUGENE P&DF
PORTLAND OR	PORTLAND P&DC
PORTLAND OR	SALEM P&DF
PORTLAND OR	PORTLAND AMF
RICHMOND VA	CHARLOTTESVILLE P&DF
RICHMOND VA	NORFOLK P&DC
RICHMOND VA	RICHMOND P&DC
RICHMOND VA	NORFOLK AMF
RICHMOND VA	RICHMOND AMF
RIO GRANDE	AUSTIN P&DC
RIO GRANDE	CORPUS CHRISTI P&DC
RIO GRANDE	EL PASO P&DC
RIO GRANDE	MIDLAND P&DF

INSTALLATION LIST BY CLUSTER

CUSTER NAME	FACILITY NAME
RIO GRANDE	SAN ANTONIO P&DC
RIO GRANDE	WACO P&DF
RIO GRANDE	SAN ANTONIO AMF
ROYAL OAK MI	FLINT P&DC
ROYAL OAK MI	ROYAL OAK P & DF
ROYAL OAK MI	ROYAL OAK P&DC
SACRAMENTO CA	MARYSVILLE P&DF
SACRAMENTO CA	SACRAMENTO P&DC
SACRAMENTO CA	STOCKTON P&DC
SACRAMENTO CA	SACRAMENTO AMF
SALT LAKE CITY UT	SALT LAKE CITY P&DC
SALT LAKE CITY UT	SALT LAKE CITY AMC
SAN DIEGO CA	MARGARET SELLERS P&DC
SAN DIEGO CA	MIDWAY P&DF
SAN DIEGO CA	SAN BERNARDINO P&DC
SAN DIEGO CA	SAN DIEGO AMF
SAN FRANCISCO CA	NORTH BAY P&DC
SAN FRANCISCO CA	SAN FRANCISCO P&DC
SAN FRANCISCO CA	SAN FRANCISCO AMC
SAN FRANCISCO CA	SAN FRAN INTL SVC CTR
SAN JOSE CA	BAKERSFIELD P&DC
SAN JOSE CA	FRESNO P&DC
SAN JOSE CA	SALINAS P&DF
SAN JOSE CA	SAN JOSE P&DC
SANTA ANA CA	ANAHEIM P&DF
SANTA ANA CA	INDUSTRY P&DC
SANTA ANA CA	SANTA ANA P&DC
SANTA ANA CA	ONTARIO INTL AIRPORT
SE NEW ENGLAND	BROCKTON P&DC
SE NEW ENGLAND	CAPE COD P&DF
SE NEW ENGLAND	PROVIDENCE P&DC
SEATTLE WA	EVERETT P&DF
SEATTLE WA	OLYMPIA P&DF
SEATTLE WA	SEATTLE P&DC
SEATTLE WA	TACOMA P&DC
SEATTLE WA	SEATTLE AMC
SOUTH FLORIDA	FORT LAUDERDALE P&DC
SOUTH FLORIDA	MIAMI P&DC
SOUTH FLORIDA	SOUTH FLORIDA P&DC
SOUTH FLORIDA	MIAMI AMC
SOUTH FLORIDA	MIAMI INTL SVC CTR
SOUTH GEORGIA	AUGUSTA P&DF
SOUTH GEORGIA	MACON P&DC
SOUTH GEORGIA	SAVANNAH P&DF
SOUTH JERSEY NJ	DELAWARE P&DF
SOUTH JERSEY NJ	SO JERSEY P&DC
SPOKANE WA	BOISE P&DC
SPOKANE WA	PASCO P&DF
SPOKANE WA	SPOKANE P&DC
SPOKANE WA	BOISE AMF
SPOKANE WA	SPOKANE AIR MAIL FAC
SPRINGFIELD MA	BURLINGTON P&DF
SPRINGFIELD MA	SPRINGFIELD P&DC
SPRINGFIELD MA	WHITE RIVER JUNC P&DC
SPRINGFIELD MA	SPRINGFIELD BMC
SUNCOAST	FT MYERS P&DC
SUNCOAST	LAKELAND P&DC
SUNCOAST	MANASOTA P&DC
SUNCOAST	ST PETERSBURG P&DC
SUNCOAST	TAMPA P&DC
TENNESSEE	CHATTANOOGA P&DC
TENNESSEE	KNOXVILLE P&DC

INSTALLATION LIST BY CLUSTER

CUSTER NAME	FACILITY NAME
TENNESSEE	MEMPHIS P&DC
TENNESSEE	NASHVILLE P&DC
TENNESSEE	MEMPHIS AMC
TENNESSEE	NASHVILLE AMC
TRIBORO	BROOKLYN P&DC
TRIBORO	QUEENS P&DC
TRIBORO	STATEN ISLAND P&DF
TRIBORO	LA GUARDIA AMF
VAN NUYS CA	OXNARD P&DF
VAN NUYS CA	PASADENA P&DC
VAN NUYS CA	SANTA BARBARA P&DC
VAN NUYS CA	VAN NUYS P&DC
WESTCHESTER NY	MID-HUDSON P&DC
WESTCHESTER NY	WESTCHESTER P&DC
WESTERN NEW YORK	BUFFALO P&DC
WESTERN NEW YORK	ELMIRA P&DF
WESTERN NEW YORK	ROCHESTER P&DC
WESTERN NEW YORK	BUFFALO AMF
CAPITAL METRO AREA	CAPITAL BELTWAY HASP
CAPITAL METRO AREA	RANDOLPH DRIVE P & DC
GREAT LAKES AREA	CHICAGO OHARE AMC ANX
GREAT LAKES AREA	O'HARE AMC
GREAT LAKES AREA	CHICAGO METRO SFC HUB
GREAT LAKES AREA	CHICAGO INTL SVC CTR
MID-ATLANTIC AREA	GREENSBORO BMC
NEW YORK METRO AREA	NJ INTL & BMC
NEW YORK METRO AREA	NEW YORK ISC
SOUTHEAST AREA	ATLANTA BMC
SOUTHEAST AREA	JACKSONVILLE BMC
SOUTHEAST AREA	MEMPHIS BMC
SOUTHEAST AREA	SOUTHEAST AREA HASP
SOUTHWEST AREA	DALLAS AMC
SOUTHWEST AREA	DALLAS BMC
SOUTHWEST AREA	DALLAS INTL SVC CTR
WESTERN AREA	DENVER BMC
WESTERN AREA	SEATTLE BMC

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-48.

Please refer to the response to OCA/USPS-23(b). Please explain the procedure for ensuring correct postage payment for DPS-sorted First-Class Mail.

RESPONSE:

It is assumed that the question pertains to standard size delivery point sequenced letters on which the postage was paid by means of postage stamps or meters. Presently, such letters are usually presented to carriers and box section clerks in trays. Carriers are able to determine if proper postage is affixed before delivery to individual street addresses. Clerks are able to do the same as they separate the mail intended for individual post office boxes.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T34-49. Please explain how PETE scores are calculated and provide documents explaining the operation of the system.

RESPONSE:

PETE scores are calculated as follows:

$$\%_{ontime} = \frac{(Pieces_{ontime})}{(Pieces_{total})} * (100)$$

Within each service commitment, ontime pieces are defined as pieces delivered within the service commitment.

Test results are weighted in accordance with actual origin to destination Priority mail volume flows.

An explanation of the operation of the PETE system is contained in the brochure, PETE Priority End-to-End Measurement System. See attachment.



PETE

PRIORITY END-TO-END MEASUREMENT SYSTEM

The Postal Service contracted to measure Priority Mail service performance independently and objectively beginning in AP 5, FY97.

Modeled closely after EXFC, PETE is an end-to-end service performance measurement system; it measures identified Priority Mail performance from the time mail enters the mailstream until it is delivered to a household, small business, or post office box. PETE measures service performance from a customer perspective and produces accurate, independent, externally generated results.

PETE is designed to provide quarterly estimates of destinating Priority Mail service performance for the 85 Performance Clusters, encompassing 301 3-digit ZIP Codes, from their overnight and two-day service commitment areas. This network represents about 70% of the nation's destinating, identified Priority Mail volume.

NOTE Because of the differences in volume flows and market demands, the 3-digit ZIP Codes contained in PETE may differ from those in EXFC.

The PETE Process...

is comprised of the following seven steps:

STEP 1 SAMPLE SELECTION

PETE begins with Sample Selection, the planning that determines the timing, location, and quantity of test mail pieces dropped into the mailstream and to whom they are addressed. The plan also provides for contingencies that might occur throughout the test quarter.

FACT Each cluster receives approximately 726 overnight pieces and 920 two-day pieces each Postal Quarter.

FACT Mail flows between clusters are based on ODIS volumes. The number of pieces mailed from each cluster is in proportion to its ODIS origin volumes to the destination clusters by commitment.

FACT Selection of drop points is a two-part process using information from the USPS Collection Box Management System (CBMS): 1) The number of test pieces inducted at the 3-digit ZIP level is based on origin 3-digit ZIP ODIS volumes. 2) Drop points are selected at the 5-digit level in accordance with the density of regular collection boxes represented by that ZIP within the 3-digit ZIP.

FACT Drop points are only made in street collection boxes. They are selected at random, with replacement; therefore, a collection point may be selected more than once a quarter.

STEP 2 TEST MAIL FABRICATION

Test mail is fabricated especially for use in PETE. The test mail is made up in various kits.

FACT Test pieces may be either stamped or metered.

STEP 3 TEST MAIL DISTRIBUTION

The contractor receives trays of all kit types every week. These test mail pieces are assembled into bundles and sent to droppers in the 85 performance clusters.

FACT A bundle contains between two and ten pieces. Test mail pieces for the overnight and two-day service commitments are included in most bundles.

STEP 4 TEST MAIL INDUCTION

PETE droppers induct test mail into the mailstream in collection boxes during the authorized drop window. The drop window begins at 5:00 A.M. on the day of the scheduled induction and ends 30-minutes prior to the last posted pick-up time on the collection box.

FACT Inductions may occur six days a week, Monday through Saturday. No drops are made on Sundays or federal holidays.

FACT Inductions occur evenly throughout the test quarter; both across all weeks within a quarter, and across all delivery days within a week.

FACT Droppers are required to record the date, time, and location of the induction, the box ID number, all last pick-up times shown on Label 55, and the date the label was printed. NOTE: Box ID numbers are not provided to the droppers in advance.

FACT If discrepancies occur between the CBMS data and Label 55, the information on the collection box label *at the time of the drop* defines the effective date of induction.

STEP 5 DATA COLLECTION

Upon receipt of test mail, reporters call a toll-free number to report the date of receipt and other information for each piece. All reporters must be able to segregate test mail by date of delivery, and no reporter may receive mail through a mailroom or other third party agent.

FACT Reporters are required to call in test mail information within 24 hours.

STEP 6 DATA VALIDATION

The contractor performs numerous quality control checks on the data.

FACT More than 100 quality checks and controls are applied to all aspects of the PETE system.

STEP 7 REPORT GENERATION

The Postal Service receives continuous updates from the contractor which are made available as weekly and quarterly reports in the Corporate Information System (CIS). For reports and system updates, select Option 38: Transit Time Measurement System.

PETE Clusters (85)

3-Digit ZIP Codes included in system

Akron	442, 443	Long Island	116, 117, 118
Alabama	360, 361, 362	Los Angeles	900
Alaska	995	Louisiana	700, 701
Albany	120, 121, 122, 123	Maine	040, 041
Albuquerque	870, 871	Mid-America	640, 641
Appalachian	250, 251, 252, 253	Mid-Carolinas	280, 281, 282, 283, 284
Arizona	850, 852, 853, 857	Midwest-Centri	614, 615, 616, 617, 618, 619
Arkansas	720, 721, 722	Milwaukee	530, 531, 532, 534, 535, 537
Atlanta	300, 301, 302, 303, 305	Mississippi	381, 382
Baltimore	210, 211, 212, 214	New Hampshire	630, 631, 632, 633
Big Sky	590, 591	New York	100
Boston	621, 622, 624	North Florida	320, 321, 322
Capital	200, 207, 208, 209	Other Illinois	600, 601, 602, 603
Caribbean	907, 908	Other N. Jersey	070, 071, 072, 073, 076
Central Florida	327, 328, 329, 334, 347, 349	Northern Virginia	201, 220, 221, 222, 223
Central Illinois	684, 685	Northland	580, 551, 553, 554
Central N. Jersey	078, 079, 085, 086, 087, 088, 089	Oakland	945, 946, 947, 948
Central Plains	686, 681	Oklahoma	730, 731, 740, 741
Chicago	606	Philadelphia	190, 191
Cincinnati	450, 481, 482, 483, 484	Pittsburgh	150, 151, 152
Cleveland	440, 441	Portland, OR	970, 971, 972, 986
Colorado/Wyoming	800, 801, 802, 803, 805	Providence	020, 023, 027, 028, 029
Columbus	430, 431, 432	Richmond	231, 232, 233, 234, 235, 236, 237
Connecticut	060, 061, 064, 065, 068, 069	Rio Grande	781, 782, 785, 787
Dakotas	570, 571	Royal Oak	480, 483
Dallas	750, 751, 752	Sacramento	950, 958
Detroit	481, 482	Salt Lake City	840, 841
Erie	164, 165	San Diego	919, 920, 921, 923, 924, 925
Fort Worth	790, 791	San Francisco	940, 941, 943, 944, 948, 964
Gateway	630, 631	San Jose	950, 951
Greater Indiana	460, 461, 462, 463, 464	Santa Ana	917, 918, 926, 927, 928
Greater Michigan	488, 489, 495	Seattle	980, 981, 984
Greater S. Carolina	292, 294, 296	South Florida	330, 331, 333
Greensboro	271, 272, 273, 274, 275, 276, 277	South Georgia	310, 312, 317
Harrisburg	170, 171, 180, 181	South Jersey	080, 081, 083
Hawkeye	500, 501, 502, 503	Spokane	990, 991, 992
Honolulu	967, 968	Springfield	010, 011
Houston	770, 772, 773, 774	Summit	335, 336, 337, 348
Kentuckiana	400, 402, 471	Tennessee	370, 371, 372, 381
Lancaster	180, 183, 184	Tiboro	110, 112, 113
Las Vegas	890, 891	Van Nuys	912, 914, 915, 916, 930, 931, 934
Long Beach	902, 903, 904, 905, 906, 907, 908	Westchester	105, 106, 107, 108
		West New York	140, 141, 142, 143, 144, 145, 146

For additional information ...

The design of the PETE process and the procurement of the contract—including the development and implementation of the Statement of Work—is the responsibility of the Consumer Advocate.

Questions regarding USPS policy issues and the Transit Time Measurement contract should be directed to:

~~XXXXXXXXXXXX~~ MANAGER
CUSTOMER SATISFACTION MEASUREMENT
475 LENFANT PLZ SW RM 5800
WASHINGTON DC 20260-2205

Specific contract or system design questions should be directed to:

~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~
~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~

The staff of Service Analysis and Assessment (SSA) is available to respond to your questions. SAA can also address your needs by providing on-site briefings, training sessions, and presentations to assist in understanding and reacting to PETE data.

Requests for on-site presentations should be directed to:

~~XXXXXXXXXXXX~~ MANAGER
SERVICE ANALYSIS AND ASSESSMENT
475 LENFANT PLZ SW RM 6631
WASHINGTON DC 20260-1602

Questions relating to the data or reporting system should be directed to:

~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~
~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~

For additional training materials, please contact:

~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~
~~XXXXXXXXXXXX~~ (202) 268-~~XXXX~~

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
March 2, 2000