

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2000]

DOCKET NO. R2000-1

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS 231-239]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. The instructions contained in my Interrogatories dated February 29, 2000, are incorporated herein. **PLEASE EXPLAIN AND DISCUSS ALL INSTANCES WHERE IT IS NOT POSSIBLE TO CONFIRM THE DESIRED STATEMENT RATHER THAN JUST STATED THAT IT IS NOT CONFIRMED.** If the witness does not have the expertise to provide an accurate response to the interrogatory, please refer it to a witness or USPS employee that does.

May 9, 2000

Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-231 Please refer to the response of the USPS filed on May 4, 2000, to question posed by Commissioner Goldway during cross-examination on April 25, 2000. As a result of this filing, I now ask the presently objected to interrogatories of mine to be considered as follow-up interrogatories to this response, namely DBP/USPS-70 subparts a-k, DBP/USPS-71, and DBP/USPS-72 subparts f-i. Responses to my interrogatories are very much related to Commissioner Goldway's concerns. Furthermore DBP/USPS-19 through 21 relate to the proper collection of mail as deposited by the customer [see definition for Service Standard on page 1 of the Policy].

DBP/USPS-232 Please furnish a listing of all changes to the standards that existed at the approval of Docket No. N89-1 that have been made through the process described on the memo attached to the response [Policy for Requesting a Service Standard Change / "Policy"] or as a result of adjustments to new circumstances.

DBP/USPS-233 Your response states that there is no operational manual that lays out how the service standards were originally developed. [a] Is there any written material that provides guidelines for the present criteria that is utilized to convert the DMCS requirement for First-Class Mail receiving expeditious handling and transportation [DMCS 252] to the actual 1-, 2-, or 3- day delivery standard? If so, please provide copies. If not, please explain how decisions on requested changes are evaluated. Please have the responsible Manager provide the guidelines that are utilized. [b] Please provide details on the distinctions that are made between the Letters and Sealed Parcels and Cards subclasses and the Priority Mail subclass which have different service standards but are all covered by the same DMCS requirement for expeditious handling and transportation.

DBP/USPS-234 Please provide a copy of the Service Standard Directory [SSD] referred to in the Policy under Policy Purpose heading.

DBP/USPS-235 [a] Please refer to the last paragraph on page 1 of the Policy and provide examples of those types of documentation which would support the moving of overnight offices to 2-day standards. [b] Please provide examples of documentation which would not support making changes. [c] Please discuss the effect of cost on making the evaluation for changes. This should include capital expenditures as well as manpower and transportation costs.

DBP/USPS-236 The Policy makes numerous references to customer relations areas such as, "needs of the customer", "improve customer satisfaction", "public perception", and "public relations impact." Please explain how any reduction in services standards could be perceived by the public as being an improvement in service.

DBP/USPS-237 Please refer to paragraph b at the bottom of page 3 of the Policy and provide a copy of the most current "Customer Needs" information that is available in Product Management or Consumer Affairs.

DBP/USPS-238 Please refer to the example in paragraph 2 on page 2 of the Policy as it refers to processing in the 210-212 ZIP Code area. [a] Please confirm that ZIP Codes 210

and 211 are for Maryland cities served out of the Baltimore Processing Plant and that ZIP Code 212 is for the city of Baltimore and is also served out of the same plant. [b] Please confirm that some or all incoming mail for ZIP Codes 210-212 will be commingled on arrival at the plant. [c] Please confirm that the completion of processing of the incoming mail for both the Baltimore city ZIP Code 212 and the associated offices mail ZIP Codes 210 and 211 will be completed at the same time. [d] Explain how the mail for ZIP Code 212 can have a service standard that would cause it to be delivered either a day before or a day after the mail which is going to the associate offices with ZIP Codes 210 and 211. [e] Would the Baltimore city ZIP Code, 212 in this case, have a faster or slower delivery standard than the associated offices, 210 and 211 in this case? [f] Confirm that there are some processing plants, such as Hackensack NJ 076, where both the city and the associated offices share the same 3-digit ZIP Code prefix and therefore would be required to have the same delivery standards.

DBP/USPS-239 Define and explain the term NASS used in paragraph d on page 3 of the Policy.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin May 9, 2000

David B. Popkin
