

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

PARTIAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
(DFC/USPS-96(a))

The United States Postal Service hereby provides this response to the following interrogatory of Douglas F. Carlson: DFC/USPS-96(a), filed on May 16, 2000. This response is filed without waiving the objection to this interrogatory filed today.

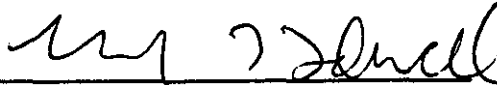
The interrogatory is stated verbatim and is followed by the partial response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

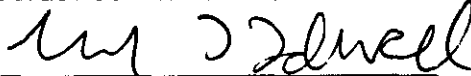
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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June 26, 2000

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.


Michael T. Tidwell

June 26, 2000

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DFC/USPS-96

Please refer to the Postal Service's response filed May 4, 2000, to the question posed during oral cross-examination of witness Mayes at Tr. 11/4608-11. For this interrogatory, a change in a service standard does not include correction of a mere database error if correction of the database error did not cause any change in the service standards actually implemented in processing plants or distribution networks.

- (a) Please identify every origin-destination pair for which the service standard for First-Class Mail or Priority Mail was changed during calendar year 1997, 1998, 1999, or 2000. For each origin-destination pair for which the service standard for First-Class Mail or Priority Mail was changed, please identify the prior service standard and the new service standard, and please summarize the reason for the change.
- (b) For each origin-destination pair for which the service standard for First-Class Mail or Priority Mail was changed during calendar year 1997, 1998, 1999, or 2000, please provide copies of all documents generated in accordance with the review described in the response filed on May 4, 2000, including submissions, appeals, and decision transmittals.

RESPONSE:

- (a) [Objection filed .] Based upon all possible 3-digit ZIP Code combinations, currently there are approximately 836,000 origin-destination pairs for which service standards are established for the various mail classes in the USPS Service Standards database. Beginning in Accounting Period 7 of Fiscal Year 2000, the Postal Service switched to a configuration of its electronic Service Standards database which does not distinguish between (1) changes which (have been or) are made under the Service Commitment Change (SCC) policy directive (February 7, 1997) from (2) those which (have been or) are made to correct database errors. Since FY 2000, AP 7, no changes have been approved under the SCC policy directive, although there have been some database error

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corrections. In conjunction with the FY 2000 AP 7 database maintenance change, existing hard-copy files pertaining to SCC policy requests and database corrections were discarded. These files included scores of SCC policy requests, the overwhelming majority of which were not approved. Notwithstanding the general directive to purge old files, the Postal Service has located four yet-to-be-discarded files pertaining to SCC policy decisions made in 1997 and 1998 to approve *de minimis* First-Class Mail or Priority Mail service standard change requests unrelated to database errors. These changes are summarized below:

- File #1 : The Priority Mail service standard from Memphis TN 380 to Little Rock AR 722 was changed from overnight to 2-day
1 downgrade
- File #2: A relocation in mail processing operations from Trenton NJ 085 to Monmouth NJ 077 NJ resulting in numerous 1-day changes in origin-destination pair service standards:
20 Priority Mail downgrades
10 First-Class downgrades
68 First-Class upgrades
- File #3: The First-Class Mail service standard from Portland ME (040-043, 045, 048) to Bangor ME 047 was changed from overnight to 2 days
6 downgrades
- File #4: The Dothan AL 363 First-Class Mail and Priority Mail service standards were changed to match those of Montgomery AL, resulting in numerous 1-day changes in origin-destination pair service standards:
14 First-Class downgrades
56 First-Class upgrades
3 Priority Mail downgrades
102 Priority Mail upgrades

(b) Objection filed.