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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-1 THROUGH 9 AND 12 THROUGH 15)

The United States Postal Service hereby files its responses to the following
interrogatories of the Office of the Consumer Advocate that were filed on September 17,
2001: OCA/USPS-1 through 9 and 12 through 15.

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

The responses to OCA/USPS-10 and 11 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSES OF THE UNITED STATES POSTAL SERVICE
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OCA/ USPS-1

Docket No. N89-1, USPS-T-2, Appendix A at 19, indicated that there was a semi-annual delivery standard review process. Are service delivery standards currently reviewed on a semi-annual basis? If so, what specific classes and types of mail are reviewed and what does the delivery standard review process encompass? If not, please explain what delivery standards are reviewed and when.

RESPONSE:

Since 1992, Service Standards have been modified and reviewed on a Postal Quarter (PQ) basis by the office of Service Management Policies and Programs. During each PQ, staff members review recent changes and proposed changes to certain aspects of our various processing and transportation networks. For example, with regard to First-Class Mail, Priority Mail, Periodicals, Standard Mail and Package Services, the shifting of ZIP Code responsibilities between processing facilities due to an Area Mail Processing (AMP) plan; the activation or termination of processing facilities; the reassignment of ZIP Code responsibilities, the change of Labeling requirements in our Domestic Mail Manual, the addition or deletion of Area Distribution Centers (ADCs), Automated Area Distribution Centers (AADCs), Processing and Distribution Centers (P&DCs), Processing and Distribution Facilities (P&DFs), Customer Service Facilities (CSFs) or Sectional Centers (SCFs) which make-up our Distribution Network, may influence our decision to modify a Service Standard as either an Upgrade or Downgrade. Also taken under consideration on a PQ basis are special requests from our Area Offices for Upgrades or Downgrades based on locally determined factors such as available transportation, operating plans, facility location, activation or termination, which in some manner may be affecting their ability to reasonably be expected to meet the existing Service Standard. There is a specific policy published electronically on the

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Response to OCA/USPS-1 (continued)

USPS Corporate Information System (CIS) which governs the submission of these Area Office requests. That policy has been extracted and is included in USPS LR C2001-3.1 as file OCA-1.

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OCA/USPS-2.

Currently, is the Divisional General Manager responsible for finalizing the First-Class delivery standards? If not, please explain who is responsible for finalizing First-Class delivery standards?

RESPONSE:

The Postal Service eliminated the position of Field Division/General Manager during the 1992 reorganization. Subsequently, an office of Service Management Policies and Programs was created at Postal Service Headquarters. A National Program Manager for Service Standards makes the initial recommended decision regarding the approval of Service Standard changes or adjustments, pending concurrence of the Manager, Service Management Policies and Programs, and, subsequently, the Vice President, Operations Planning and Processing.

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OCA/USPS-3.

What office or personnel position is responsible for providing the final approval for the various regional delivery standards?

RESPONSE:

During the 1992 reorganization, the Postal Service eliminated the five Regions and 86 Field Divisions that existed during Docket No. N89-1. Ten Area Offices operating under a Vice-President, Area Operations, subsequently replaced them. Subsequently, the Area offices make recommendations for Service Standard changes/adjustments to the Vice President, Operations Planning and Processing and the office of Service Management Policies and Programs, and the final decisions are made at the Headquarters level.

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OCA/USPS-4.

Docket No. N89-1, USPS-T-2, Appendix A at 20, indicated that prior to implementation of the approved delivery standards, each "Field Division Director of Marketing and Communications will execute a plan to notify business and residential customers of the resulting delivery changes." Please describe the methods used and provide copies of all documentation used to inform business and residential customers of the changes that were made in the Phase 2 delivery standards.

RESPONSE:

During the 1992 reorganization, the Postal Service eliminated the 86 Field Divisions that existed during Docket No. N89-1, and which included the position of "Field Division Director of Marketing and Communications." Since the changes that were made during FY2000 and FY2001 consisted of the finalization of the Phase 2 (2-day and 3-day) changes initiated in the early 1990's as part of the realignment plan reviewed in Docket No. N89-1 and constituted such a small percentage of our overall Service Standard Network, the Postal Service did not consider it necessary to inform business and residential customers of these changes in advance. Efforts to locate any documentation used to inform business and residential customers of the initial Phase 2 changes in the early 1990's have not borne fruit.

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OCA/USPS-5.

Does the Postal Service believe that the term "one-day standard" is equivalent to the term "one-day delivery"? If not, please explain.

RESPONSE:

One-day (overnight or next-day, excluding Sundays and holidays) delivery is the goal, or "standard" for First-Class Mail for which the operational objective of the Postal Service is to provide that level of service. Instances of one-day delivery can also occur for First-Class Mail for which the operational objective is to provide 2-day or 3-day service. Therefore, the provision of 1-day delivery in a given instance is not always indicative of the standard for that mail.

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OCA/USPS-6.

Does the Postal Service believe that the term "two-day standard" is equivalent to the term "two-day delivery"? If not, please explain.

RESPONSE:

Two-day delivery is the goal, or "standard" for First-Class Mail for which the operational objective of the Postal Service is to provide that level of service (assuming the scheduled delivery day is not a Sunday or holiday). Instances of two-day delivery can also occur for First-Class Mail for which the operational objective is to provide 1-day or 3-day service. Therefore, the provision of two-day delivery in a given instance is not always indicative of the standard for that mail.

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OCA/USPS-7.

Does the Postal Service believe that the term "three-day standard" is equivalent to the term "three-day delivery"? If not, please explain.

RESPONSE:

Three-day delivery is the goal, or "standard" for First-Class Mail for which the operational objective of the Postal Service is to provide that level of service (assuming the scheduled delivery day is not a Sunday or holiday). Instances of three-day delivery can also occur for First-Class Mail for which the operational objective is to provide 1-day or 2-day service. Therefore, the provision of three-day delivery in a given instance does not is not always indicative of the standard for that mail.

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OCA/USPS-8.

An article, "USPS allows comment on service changes," January 1990, Bank Operations Bulletin, indicates that the ABA, other mailers and bankers would be allowed to review service changes well before they were put into effect. (Docket No. N89-1, Transcript of Proceedings, Volume 5 at 1065.) The following interrogatories refer to information provided in that article.

- a. Were the ABA, residential customers and other businesses' concerns factored into the adopted Phase 2 service changes? If so, please explain (1) what concerns were addressed and (2) how those concerns were factored in. If customer's concerns were not factored in, please explain why not.
- b. Prior to the "Phase 2" service changes, were the ABA, residential customers and other businesses given the opportunity to review and comment on the service changes in advance of their implementation?
- c. If your response to part "b" of this interrogatory is affirmative, please provide copies of the comments provided to the Postal Service by the various mailers. If no comments can be provided, please explain why none are available.
- d. If no opportunities to review the service changes were provided to the ABA, residential customers or businesses, please explain why none were provided.
- e. Please provide copies of all documents provided to the ABA, residential customers and other businesses informing them of the USPS service changes.
- f. Please provide copies of information or data analysis performed by or for the Postal Service regarding the ABA, residential customers and businesses.

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Response to OCA/USPS-8

Since the changes that were implemented during FY2000 and FY2001 constituted the finalization of the Phase 2 changes initially implemented in the early 1990's, and they constituted such a small percentage of our overall Service Standard Network, no effort was made to provide for review by business and residential customers, including ABA, above and beyond any review that took place as Phase 2 was initially implemented. Thus far, efforts to locate any records pertaining to customer comments on the initial implementation of Phase 2 in the early 90's have not borne fruit.

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OCA/USPS-9.

For the period two years prior to, and all periods subsequent to, the implementation of the Phase 2 service standards, please provide copies of any reports and other data analysis performed indicating the actual service standards achieved. If no analysis was performed, please explain why.

RESPONSE:

For the purposes of the finalization of the Phase 2 Service Standard changes in FY2000 and FY2001, the Postal Service did not perform any historical analysis regarding the service performance between any 2-Day or 3-Day pairs. This was a conscious management decision which was made in order to prevent considerations of past service performance to unduly influence whether a particular Origin-Destination pair ought to be 2-Day or 3-Day and to focus on an even-handed "universal" formula by which to determine the potential "achievability" of planned service between a pair. It was determined that consistency of service could be improved if stricter discipline were brought to mail processing and transportation operations. Historical performance data would not have been useful in projecting what final adjustments to make in FY 2000 and FY 2001 to the 2 & 3-Day Model, since the operational paradigms by which those historical service performance scores were achieved would not be the same after the standardization of Clearance Times (CTs) and Critical Entry Times (CETs).

While there were "canned" reports available in our measurement systems that may have been able to measure some performance legs of the pairs under consideration for changes under the Model, the Service Standard Team did not avail itself at any time of any of that data. The 2 & 3-Day Model used and maintained a separate and distinct

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Response to OCA/USPS-9 (continued):

"Organizational Structure List", commonly referred to as the "GOEZINTA-list", which differed, in some cases significantly, from the traditional design of the canned performance files in our measurement systems. This would have required the Service Standard Team to "manipulate" the existing point-to-point service measurement by use of a programmer to re-work the data into the "GOEZINTA" format. This was never done before, during or after the Phase 2 changes that were implemented during FY-2000 and FY-2001.

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OCA/USPS-12.

Mr. Gannon's Declaration at page 8 indicates that the Postal Service built a computer model using a customized transportation software package to determine which ZIP Code pairs qualified for 2-Day service by using a formula which could be applied nationwide.

- a. Please describe the formula in both mathematical and layman's terms.
- b. Please provide a copy of the computer model and a copy of the customized transportation software package.

RESPONSE:

a. Each of the Postal Service's 83 Processing & Distribution Facilities (P&DFs) and 124 Customer Services Facilities (CSFs) was assigned as a "subordinate facility" to one of the larger 174 Processing & Distribution Centers (P&DCs) in the contiguous 48 states. Each P&DC was then considered, for Service Standard Mapping purposes, to be the "Parent" P&DC. The Postal Service then purchased and used an off-the-shelf transportation software package named PC Miler, which has a plug-in module to interface with Microsoft Excel, to determine projected travel-time between an Origin and Destination.

The Postal Service then used the 5-Digit ZIPs of the Origin "Parent" P&DC, along with the 5-Digit ZIPs of the Destination Area Distribution Center (ADC), and PC Miler to determine the most appropriate route and, based on the appropriate State speed limits and type-of-road being traveled on, projected an estimated "travel time" into an Excel workbook. The basic "mathematical" formula used is as follows

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Response to OCA/USPS-12 (continued):

All Service Standard pairs that were not already Overnight (1-Day) were eligible.

If the "drivetime" between the Origin Parent P&DC and the Destinating ADC (as mapped by our "GOEZINTA-list") equaled from 0 hours-to-12.049 hours, then the Origin Service Standard was considered eligible for an Originating 2-Day Service Standard.

If the "drivetime" between the Origin Parent P&DC and the Destinating ADC (as mapped by our "GOEZINTA-list") equaled 12.05 hours, or more, then the Origin Service Standard was considered eligible for an Originating 3-Day Service Standard.

The Model allowed for Originating "Outliers" (see response to OCA/USPS-13) and for either Upgrade or Downgrade "Exceptions", based on Headquarters-approved requests from our Area offices in response to localized situations.

The Destination Service Standards for all ZIPs contained in any area listed as a Destination ADC were all to be consistent throughout the ADC (i.e., either all 2-Day or all 3-Day).

PC Miler allowed the Postal Service to customize individual State-by-State speeds to match those by which the Postal Service contracts for surface transportation services. Due to the large size of the vehicles it uses, the Postal Service has developed a modified list of State speeds that is used in drafting transportation contracts. A copy of that document is included in USPS LR C2001-3/1 as file OCA-12.

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Response to OCA/USPS-12 (continued):

Since there was an over 19% difference, on an average, between the State Limits and the speeds incorporated in Postal Service surface transportation contracts, the Postal Service modified PC Miler to list the appropriate State speed and then, using a formula in Excel, added a corresponding 20% more time to the travel time initially projected by PC Miler, in order to allow for the slower contract speeds.

Additionally, since mail often crosses Time Zones while being transported, the Postal Service made mathematical calculations to adjust travel times to corresponding Wall-Clock Times, in order to maximize the number of 2-Day offices which could consistently be reached in time for 2-Day delivery. Example:

The actual highway drivetime between Denver CO and Las Vegas NV is 13.0 hours. However, if one left both places simultaneously at 02:30 AM, the trip from Denver would arrive at 14:30 PM Las Vegas time and the trip from Las Vegas would arrive at 16:30 PM Denver time – a difference of 2 hours, even though there is only a “one-hour” Time Zone difference. For this reason, the 2 & 3-Day Model also made appropriate mathematical corrections to the travel times projected by PC Miler in order to determine the “real” Wall-Clock Time at the destination, since that is the barometer of whether or not there is adequate time available to process the mail in time for 2-Day delivery.

- b. A copy of the Excel Workbook generated from the PC Miler add-in module, which reflects the projected travel time between Originating Parent P&DCs and Destinating ADCs, is included in USPS LR C2001-3/1 as file OCA-12B-1. A copy of the Excel workbook used in developing the 2 & 3-Day Model with regard to the “Organizational Structure List” (the “GOEZINTA-list”) used as part of the model, is

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Response to OCA/USPS-12 (continued):

included in USPS LR C2001-3/1 as file OCA-12B-2. A copy of the FOCUS source code used on our mainframe computer to merge the GOEZINTA-list with the PC Miler drivetime results, and apply the results to the 849,106 Service Standards maintained in our system, is included in USPS LR C2001-3/1 as file OCA-12B-3.

With regard to the PC Miler software package, the company that produced the software, ALK Associates, Inc. (ALK), was contacted to determine whether the Postal Service could make a copy of PC Miler in order to respond to this interrogatory. ALK has advised the Postal Service that it has a "single user" license and that the provision of a copy of the software to any other party would be considered a violation of the terms of the licensing agreement. The company has informed the Postal Service that interested parties can make arrangements to purchase a copy of the software by calling the following telephone number: (609) 683-0220. A copy of the response from ALK is included in USPS LR DC2001-3/1 as file OCA-12B-4.

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OCA/USPS-13.

Mr. Gannon's Declaration states at page 8 that, "we decided upon a maximum 12-hour highway drive-time range by which to determine those destinations that would become part of the 2-Day service area for any Processing Plant of origin. The remaining 3-digit ZIP-Code areas beyond 12 hours became part of the 3-Day service standard network."

- a. Does this mean that the 12-hour drive time standard applies only to First-Class Mail originating at a processing plant. If so, then for any given processing plant, could the service standard be different for mail entered into the mailstream at a mailbox within the processing plant's processing area? If not, please explain.
- b. Did any 3-digit Zip Code pairs that were changed from a 2-Day to a 3-Day service standard involve less than a 12-hour highway drive time? If so, please identify them by ZIP-Code and location and indicate whether they were concentrated in a particular geographic area of the nation.

RESPONSE:

- a. As explained in response to OCA/USPS-12, all CSFs and P&DFs were assigned to Parent P&DCs regarding the 2 & 3-Day Model. Therefore, each P&DC, along with its subordinate CSFs and P&DFs, all have the exact same Originating 2 & 3-Day Service Standards. This includes all mail that is deposited by the locally determined posted times at mailboxes, post offices and all processing facilities feeding into the Parent P&DC. In all these instances, the Originating 2 & 3-Day Service Standards will be the same regardless of where the mail is deposited, as long as it is deposited by the posted time. The only exception to this is that the 2 & 3-Day Model allowed for 17 remotely located CSFs and P&DFs, out of the 381 Originated Processing Facilities, to be designated as "Outliers," offices that could not reach the designated "Parent" P&DC in time to connect to the planned 2-Day Transportation Network. In those 17 cases, the Service Standards were allowed to remain as they were prior to the finalization of

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Response to OCA/USPS-13 (continued):

Phase 2 changes initiated during FY2000 and FY2001. However, even in those 17 cases, the mail that is deposited by the locally determined posted times at mailboxes, post offices and all facilities feeding into the CSF or P&DF which has been designated as an "Outlier" are consistent throughout the whole area of deposit, in that the Service Standards remain consistently the same.

b. Columbus OH P&DC (ZIP Codes 430, 431, 432, 433, 437, 438, 456 & 457) to ADC Queens NY (ZIP Codes 090, 091, 092, 093, 094, 095, 096, 097, 098, 103, 110, 111, 112, 113, 114 & 116) which was a 2-Day Service Standard prior to the FY2000 and FY2001 changes was granted a Temporary Exception to 3-Days at the request of the Allegheny Area, even though PC Miler projected a Drivetime of 11.7 hours. This Temporary Exception was granted with the understanding that the Service Standard would be returned to 2-Day some time in the future. This was the only exception granted to the 2 & 3-Day Model wherein the Service Standard was previously 2-Days, the projected travel time between the Origin Parent P&DC and the Destination ADC was less than 12 hours, and yet the standard was subsequently changed to 3-Days.

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OCA/USPS-14.

In developing a nationwide standard for the delivery times and the computer formula for drive times, did the Postal Service consider and reject other parameters such as a combination of mileage and drive-time, or varying the standard for different geographic regions to recognize the larger distances within western states, or the proximity of a state capitol or major metropolitan area?

RESPONSE:

In developing the 2 & 3-Day Service Standard Model, other "parameters" for determining what was within reasonable reach of surface transportation were considered and rejected, such as establishing the 2-Day reach by the exclusive use of Great Circle Miles or establishing the 2-Day reach by the exclusive use of Highway road mileage.

During this process, there was also some rumination about whether we could establish or limit what qualified as a 2-Day Service Standard mail by use of a "maximum" percentage "cap" of 2-Day Originating Volume at the Origin Facility or by use of a "maximum" percentage "cap" of 2-Day Destinating Volume at the Destination Area Distribution Center.

"Proximity", in terms of which "major metropolitan" areas or "state capitols" could be reasonably reached in a consistent fashion by dependable transportation was not only "considered" as a "parameter", it represented the primary philosophy of how the adjustments were made.

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Response to OCA/USPS-14 (continued):

In addition to allowances made for remotely located Originating Outliers defined in response to OCA/USPS-13, the Postal Service did make some accommodations by establishing "Mini-ADCs" at Spokane WA, El Paso TX and Reno NV, which are remotely located SCFs that were exceptional distances from their "real" Parent ADC.

The Postal Service designated these SCFs as Mini-ADCs for the purposes of the 2 & 3-Day Model, only, in order to increase the amount of Originating 2-Day pairs going into those remote areas.

The use of PC Miler enabled the Postal Service to use the type of roads and corresponding speed limits to develop a reasonable proxy for establishing "proximity," versus just relying on "historical" service standards, thus allowing for an expansion of the reach of surface transportation, as evidenced by the significant gain in National ZIP Code pairs now scheduled for 2-Day delivery after the completion of Phase 2. This took into consideration that traveling 2 miles through the Holland Tunnel into New York City will not likely take the same amount of time as traveling 2 miles on an Interstate Highway in Montana. This fact, along with the availability of Transportation Mapping Software that was not in existence during the early 1990's, provided a more reasonable alternative than using a simplistic approach such as "up to 600" miles to determine a reasonable 2-Day range. Not all 600-mile treks are created equal.

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OCA/USPS-15.

Mr. Gannon's Declaration states on page 7 that the National mandates for NLT ["No Later Than"] CTs ["Clearance Times"] and NET CETs ["No Earlier Than"] ["Critical Entry Times"] became effective on May 22, 1999. He indicates these times were used to establish windows for transportation between originating and destinating facilities.

- a. Please describe these National mandates in more detail and provide the documentation that establishes the National mandates.
- b. Did the various "clearance times" and "critical times" tend to be later in the western states such that the length of the service standard was affected adversely in those areas?

RESPONSE:

In addition to the information contained in paragraphs 12, 16 and 17 of the July 30, 2001, Gannon Declaration, the Postal Service established National standards for the "Clearance" of Originating Mail in the Origin Plants (approximately 380 CSFs, P&DFs and P&DCs which process our Outgoing Mail). The times were established as No Later Than (NLT) times, which means it is the latest time that the plants could finalize their outgoing mail, unless they received an official exception from Headquarters. The times established were 01:30 for 1-Day mail (even though we made no adjustments to Overnight Service Standards during this period); 02:30 for 2-Day and 3-Day Surface; and, 04:30 for mail designated for 3-Day Air Transportation. The initial notification to Area Offices regarding the establishment of the National Clearance Times was done by telecom by Joseph Harris, who was at that time the Manager, Service Management Policies and Programs office, wherein he conducted verbal "Catchball" negotiation sessions with each Area office in early 1999. During those phone conversations, he entertained (among other things) Area requests for exceptions to the new National

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Response to OCA/USPS-15 (continued):

Clearance Times. The first written reference to the new National Clearance Times was his letter to the field outlining the parameters on May 17, 1999. A copy of that document is included in USPS LR C2001-3/1 as file OCA-15A.

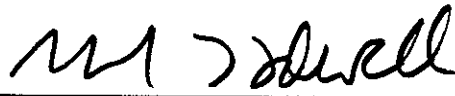
b. No, the National Clearance Times were applied uniformly across the nation. There were only 7 exceptions given (out of approximately 380 Originating Processing Facilities) where offices were allowed to clear later than the National 2-Day NLT CT of 02:30: 1 in the NY Area, 1 in the Western Area, 3 in the Southeast Area and 2 in the Midwest Area. There were no 2-Day exceptions granted in the Pacific, Southwest, Great Lakes, Allegheny, Mid-Atlantic, Northeast or Capital Metro Areas. Other than those exceptions, the remainder of the country (including the "Western States") is scheduled to clear 2-Day mail at, or before, 02:30.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

David B. Popkin
P.O. Box 528
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A handwritten signature in black ink, appearing to read "MT Tidwell", is written over a horizontal line.

Michael T. Tidwell

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October 1, 2001