

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

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(October 4, 2001)

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin that were filed on September 20, 2001: DBP/USPS-1(b,d), 2(b,d), 3, 4(a,b,f), 6(a,c), 8, 9, 10(a,b,c,e2), 11, 13, 15, 16, 18(b,c), 19(b), 21, 22, 23, 24(a,f) 25, 26, 27, 29, 30.

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

Responses to DBP/USPS-17(b) and 24(b-d) are forthcoming.

Objections to the remaining subparts of DBP/USPS-1 through 30 were filed on October 1, 2001.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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October 4, 2001

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DBP/USPS-1

Please refer to Paragraph 12 of the Declaration of Charles M. Gannon filed on July 30, 2001, (“Gannon Declaration”).

- (a) Are Clearance Times for each of the Processing and Distribution Center (“P&DC”) the same for each of the types of processing dates, such as, weekday, Saturday, Sunday, and Holiday?
- (b) Is the Clearance Time at a given P&DC the same for all mail, such as, various overnight, 2-Day, and 3-Day locations?
- (c) Provide any other instances where there will be a difference in Clearance Time for a given P&DC.
- (d) Provide a more specific definition for the term “ready for final dispatch” for the Clearance Time, specifically the relationship between time that the mail starts moving away from the P&DC and the Clearance Time.
- (e) Please indicate any activities that take place between the Clearance Time and the departure of the mail from the P&DC including an approximate time for each activity listed.
- (f) Please provide a listing of the Clearance Times for each P&DC. If there are different times for different circumstances, as noted in the response to subparts a, b, or c above, please indicate in the listing.

RESPONSE:

- (a) Objection filed.
- (b) No, while they can be the same, there is no such requirement. In fact, the National “No Later Than” (NLT) CTs now in effect are not even the same, as follows:

1-Day	01:30
2-Day	02:30
3-Day (surface)	02:30
3-Day (air)	04:30

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RESPONSE to DBP/USPS-1 (continued):

- (c) Objection filed.
- (d) Ready for final dispatch” means that all the processing, sortation, bagging, traying & labeling of the mail has been completely accomplished, and that the mail is available and ready to be loaded onto its scheduled Dispatch of Value (DOV), even if that DOV does not leave until hours later.
- (e) Objection filed.
- (f) Objection filed.

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DBP/USPS-2 Please refer to Paragraph 12 of the Gannon Declaration.

- (a) Are Critical Entry Times for each of the Processing and Distribution Center (“P&DC”) the same for each of the types of processing dates, such as, weekday and Saturday?
- (b) Is the Critical Entry Time at a given P&DC the same for all mail, such as from various overnight, 2-Day, and 3-Day locations?
- (c) Provide any other instances where there will be a difference in Critical Entry Time for a given P&DC.
- (d) Provide a more specific definition for the term “can accept mail” for the Critical Entry Time, specifically the relationship between time that the mail arrives at the P&DC and the Critical Entry Time.
- (e) Please indicate any activities that take place between the arrival of the mail at the P&DC and the Critical Entry Time including an approximate time for each activity listed.
- (f) Please provide a listing of the Critical Entry Times for each P&DC. If there are different times for different circumstances, as noted in the response to subparts a, b, or c above, please indicate in the listing.

RESPONSE:

- (a) Objection filed.
- (b) “Ready for final dispatch” means that all the processing, sortation, bagging, traying & labeling of the mail has been completely accomplished, and that the mail is available and ready to be loaded onto its scheduled Dispatch of Value (DOV), even if that DOV does not leave until hours later.
- (c) Objection filed.
- (d) Again, the premise of the 2 & 3-Day Model under discussion is that the CET targets are at the ADC level, not the P&DC level. Assuming the

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Response to DBP/USPS-2 (continued):

question actually was intended to address ADC CETs, the CET is the latest time that mail can be planned to arrive at the facility in question and still be able to be processed in time to make delivery on the intended Service Standard Day based on the Operating Plan of the Facility.

(e) Objection filed.

(f) Objection filed.

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DBP/USPS-3.

Please refer to Paragraph 16 of the Gannon Declaration.

- (a) Please provide a discussion and listing of the National parameters that were established regarding the designation of the Clearance and Critical Entry Times at various P&DCs.
- (b) Please provide copies of all memoranda, directives, electronic messages, etc. that were distributed to P&DCs to implement these National parameters.
- (c) What is the National “No Later Than” Clearance Time?
- (d) What is the National “No Earlier Than” Critical Entry Time?

RESPONSE:

- (a) 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 no adjustments were made 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. A National No Earlier Than (NET) CET was established at 18:00, Day 1, for 2-Day mail, and 08:00, Day 2, for 3-Day mail.

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RESPONSE to DBP/USPS-3 (continued):

- (b) In addition to the PowerPoint presentation filed as a part of DFC LR-1, the initial notification to our 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 of our Area offices in early 1999. During those phone conversations he entertained (among other things) Area requests for exceptions to the new National 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. See USPS LR C2001-3/1, file OCA-15A.
- (c) In addition to the information contained in paragraphs 12, 16 and 17 of the aforementioned 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) a time, 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 no adjustments were made 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.

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RESPONSE to DBP/USPS-3 (continued):

- (d) It is the earliest time that an ADC may be allowed to establish their 2-Day and 3-Day CETs in their Operating Plan. As previously explained, the National No Earlier Than (NET) CET at ADCs was established at 18:00, Day 1, for 2-Day mail. This means that, for instance, the ADCs may establish its CET at 19:00, or later, if they so desired, but they are not allowed to establish it at, say, 17:00...or anytime earlier than 18:00.



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DBP/USPS-4

- (a) Please confirm that each P&DC in the country will dispatch mail to each of the other P&DCs in the country.
- (b) Please confirm that there are intermediate facilities, such as Area Distribution Centers, in the exchange of mail that is referenced in subpart a above.
- (c) Please discuss the utilization of the intermediate facilities, including whether they are utilized for overnight, 2-Day, and/or 3-Day mail, referenced in subpart b above.
- (d) Please provide a listing of each of the intermediate facilities referenced in subpart b above.
- (e) Please provide information which will provide the details of the movement of mail from each P&DC to each of the other P&DCs in the country.
- (f) Please explain any items above that you are not able to confirm.

RESPONSE:

- (a&b) The 2 & 3-Day Service Standard Model at dispute in this proceeding maps the mail from an Origin P&DC to a Destination ADC, not to every P&DC. The Parent ADCs then extract the mail for their subordinate SCFs (P&DCs, P&DFs or CSFs) and then forward the mail to the appropriate facilities.
- (c-e) Objections filed.
- (f) N/A

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DBP/USPS-5

- (a) Please confirm that the Clearance Time relates to an individual P&DC.
- (b) Do Clearance Times apply to any of the intermediate facilities? If so, please provide a listing of the intermediate facilities and their Clearance Times (including data if there are different times on different days or destinations).
- (c) Please explain any items above that you are not able to confirm.

RESPONSE:

- (a-c) Objection filed.

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DBP/USPS-6

- (a) Please confirm that Critical Entry Times apply to both P&DCs and intermediate facilities.
- (b) If so, please provide a listing of the intermediate facilities and their Critical Entry Times (including data if there are different times on different days or for other reasons).
- (c) Please explain any items above that you are not able to confirm.

RESPONSE:

- (a) All P&DCs, P&DFs, CSFs, AADCs and ADCs have established Operating Plans that contain various types of CETs for the various types of mail they process.
- (b) Objection filed.
- (c) N/A

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DBP/USPS-7

- (a) Please advise if the Clearance Times and Critical Entry Times can be different at a given facility with respect to mail destined to different sub-facilities. For example, at ADC Facility X there will be a different CT with respect to mail destined to P&DC Facility A than for mail destined to P&DC Facility B (both P&DCs are under ADC Facility X).
- (b) If so, please provide a listing showing these different times.

RESPONSE:

(a&b) Objection filed

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DBP/USPS-8

Please refer to Paragraph 18 of the Gannon Declaration. It is noted that a 12-hour highway drive-time was chosen to determine those areas that would be 2-Day delivery.

- (a) Was the Clearance Time at a given P&DC chosen as the starting time of the 12-hour time frame? If not, what time was chosen and what is the relationship of that time to the Clearance Time for that P&DC?
- (b) What is the requirement of the ending of the 12-hour time frame? Is it the Critical Entry Time at the ADC? Is it the Critical Entry Time at the individual destination P&DC? If not, what time was chosen and what is the relationship of that time to the Critical Entry Time?
- (c) Please explain why 12 hours was chosen as opposed to some other time.
- (d) Please provide copies of any memoranda, electronic messages, etc. providing the discussion that ensued in determining the 12-hour standard.

RESPONSE:

- (a) The CTs, Buffer Times and their inter-relationship are reflected in the PowerPoint presentation submitted by the Complainant as part of DFC-LR-1.
- (b) The 12-hour drive time is a projection generated by the 2 & 3-Day Model. The Postal Service uses the 5-Digit ZIPs of the Origin "Parent" P&DC, along with the 5-Digit ZIPs of the Destination Area Distribution Center (ADC), and the PC Miler software determines the most appropriate surface route and, based on the appropriate State speed limits and type-of-road being traveled on, projects an estimated "travel time" into an Excel workbook. If the drive time between the Origin Parent P&DC and the Destinating ADC (as mapped by our "GOEZINTA-list") was projected to be

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RESPONSE to DBP/USPS-8 (continued):

between “0” hours-to-12.049 hours, then the Origin Service Standard was considered eligible for an Originating 2-Day Service Standard. If the “drive time” 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. Therefore, the “ending” of the 12 hour drive time comes when PC Miler, used in conjunction with the Time Zone adjustments contained in the model, projects a drive time of more than 12.05 hours.

- (c) Since the goal was to end-up with an increase in the number of ZIP Code pairs being served in 2-Days, 12 hours was selected as the absolute farthest the Postal Service could go and still be reasonably expected to get the mail to the destination in time to be processed for 2-Day delivery in a consistent and dependable fashion.
- (d) To-date, the search for responsive documents has not been completed. If any are located, they will be reviewed and disclosure determinations will be made expeditiously.

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DBP/USPS-9

Please refer to Paragraph 18 of the Gannon Declaration as it relates to two objectives.

- (a) Please provide the Postal Service's definition of "consistency" as it existed during Docket N89-1. Please respond to this interrogatory without requiring me to have a copy of the N89-1 data.
- (b) Please provide the Postal Service's current definition of "consistency."
- (c) Please discuss the reasons for implementing any changes that were made between the two definitions.
- (d) Please provide the Postal Service's definition of "2-Day service standard" as it existed during Docket N89-1. Please respond to this interrogatory without requiring me to have a copy of the N89-1 data.
- (e) Please provide the Postal Service's current definition of "2-Day service standard".
- (f) Please discuss the reasons for implementing any changes that were made between either of the two definitions.

RESPONSE:

- (a) Copies of the testimonies of the Postal Service's Docket No. N89-1 witnesses can be accessed via the PRC website (Archives search function). Accordingly, it will not be necessary for you to "have" copies of those documents in order to develop an understanding of the manner in which the concept of "consistency" was discussed by USPS witnesses Lazerowitz (USPS-T-1 at 11-15) and Potter (USPS-T-2 at 21-24) and Shipman (USPS-T-3 at 6-10).

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RESPONSE to DBP/USPS-9 (continued):

- (b) Nothing has changed to warrant a materially different “definition.”
- (c) N/A.
- (d) Please see the documents referenced above in response to subpart (a).  
Also see PRC Op. N89-1 at page 5.
- (e) See response to subpart (d) above.
- (f) No change has been implemented. The decision to rely more on more surface transportation in lieu air transportation to effect 2-day service is explained in the July 30, 2001, Gannon Declaration.



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DBP/USPS-10

Please refer to Paragraph 18 of the Gannon Declaration as it relates to the building of a computer model.

- (a) Please confirm that the computer model was utilized to determine highway drive-time between the two involved points.
- (b) Please confirm that those points that were 12 hours or less became 2-Day standard.
- (c) Please confirm that those points that were 12 hours and 1 minute or more became 3-Day standard.
- (d1) Please confirm that all overnight points have a time of 12 hours or less.
- (d2) Please provide a listing of those Origin-Destination ZIP Code pairs that have a time of 12 hours or less between them that are presently receiving 3-Day delivery standards.
- (e1) Please provide a listing of those Origin-Destination ZIP Code pairs that have a time of 12 hours 1 minute or more between them that are presently receiving 2-Day delivery standards.
- (e2) Please explain any items above that you are not able to confirm.

RESPONSE:

- (a) Yes, the PC Miler portion of the model generated those drive times.
- (b) The vast majority of those P&DC to ADC points that projected 12.049 hours or less drive time either stayed 2-Day or became 2-Day standards. However, some Temporary Exceptions were granted based on requests from Senior Management in our Area offices, and some pairs were allowed to remain 3-Days.

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RESPONSE to DBP/USPS-10 (continued):

- (c) Actually, the Postal Service used the criterion that if the drive time rounded to 12.1 hours (anything over 12.049 hours), the mail was eligible for a 3-Day standard. However, some Voluntary Upgrade Exceptions were granted, based on requests from Senior Management in our Area offices, and some pairs were allowed to remain 2-Days, even though they were over 12.1 hours drive time.
- (d1) Objection filed.
- (d2) Objection filed.
- (e1) Objection filed.
- (e2) N/A

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DBP/USPS-11

Please refer to Paragraph 18 of the Gannon Declaration as it relates to the building of a computer model.

- (a) Please provide details of the “customized transportation software package” that was utilized in the computer model. What is the source of this package? Please provide a copy of the documentation for this package.
- (b) Please confirm, or explain if you are unable to do so, that the objective of this package was to achieve a realistic travel time between the two given points.
- (c) Please discuss all of the criteria that were used in building the computer model.
- (d) Please advise whether the following conditions were considered and utilized, and the extent to which they affected, in determining the travel time between the two given points:
  - (1) The specific roads that would be utilized in transporting the mail between the two given points;
  - (2) The authorized speed limits for these roads;
  - (3) The average speed that vehicles travel on these roads at the time of the actual trip in transporting the mail between the two given points;
  - (4) The extent to which traffic volume may affect the speed achieved;
  - (5) The extent to which weather may affect the travel time;
  - (6) The extent to which there are variations in the travel time as a result of the time of day;
  - (7) The extent to which there are variations in the travel time as a result of the day of the week;
  - (8) The extent to which there are variations in the travel time as a result of the season of the year.
  - (9) The extent to which crossing of a time zone boundary is involved.
  - (10) The extent to which there are differences in changing to Daylight Savings Time between the two points involved (one end changes while the other end doesn't).
  - (11) The extent to which the driver of the vehicle makes a planned stop for resting or other purposes including a change of drivers.
  - (12) The extent to which it is necessary to transfer mail at an intermediate point.

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RESPONSE to DBP/USPS-11:

- (a) The software used is called PC Miler. The company that produced the software, ALK Associates, Inc., was contacted to determine whether the Postal Service could make a copy of PC Miler, or the documentation, in order to respond to this question. As indicated by USPS LR C2001-3/1 (file OCA-12B-4), the Postal Service was informed that its single user license does not permit it to provide a copy of ALK's software, or documentation and that interested parties may make arrangements to purchase a copy through ALK by calling (609) 683-0220.
- (b) Each of the 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 Phase 2 changes initiated during FY-2000 and FY-2001.

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RESPONSE to DBP/USPS-11 (continued):

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.

Each of the 83 Processing & Distribution Facilities (P&DFs) and 124 Customer Services Facilities (CSFs) was assigned as “subordinate facilities” to one of the larger 174 Processing & Distribution Centers (P&DCs) in the contiguous 48 states, which 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 determines the most appropriate route and, based on the appropriate State speed limits and type-of-road being traveled on, projects an estimated “travel time” into an Excel workbook.

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RESPONSE to DBP/USPS-11 (continued):

The basic “mathematical” formula used is as follows:

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

If the “drive time” between the Origin Parent P&DC and the Destinating ADC, as mapped by our “Organizational Structure List” (referred to as the “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 “drive time” between the Origin Parent P&DC and the Destinating ADC 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” 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.

(c) PC Miler allowed for us to customize individual State-by-State speeds to match those by which the USPS contracts. Due to the large size of vehicles used to transport mail, the Postal Service has developed a modified list of State speeds that are incorporated into highway contracts.

USPS LR C2001-3/1 (file OCA-12A) is a copy of the that document which was used in developing the 2 & 3-Day Model. Since there was an over 19%

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RESPONSE to DBP/USPS-11 (continued):

difference, on an average, between the State Limits and the speeds at which the USPS contracts at, we 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 our slower contracting speeds.

Additionally, since time zones are frequently crossed while transporting mail from east to west and vice versa, mathematical calculations were made in order to adjust travel times to corresponding wall-clock times, in order to maximize the number of 2-Day offices we could consistently reach in time for 2-Day delivery.

Example:

The actual highway drive time between Denver CO and Las Vegas NV is 13.0 hours. However, if trucks 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.

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RESPONSE to DBP/USPS-11 (continued):

So, yes, determining a realistic drive time between the two given points, used in conjunction with our operating parameters, was one of the primary objectives of the use of PC Miler in assisting with building the 2 & 3-Day Model.

(d)

- (1) Yes.
- (2) Yes.
- (3) No.
- (4) This was not part of PC Miler, but is part of the adjustment that was made for because of the speeds incorporated into highway contracts.
- (5) No.
- (6) No.
- (7) No.
- (8) No.
- (9) Yes.
- (10) Yes.
- (11) This was not part of PC Miler, but is part of the adjustment that was made for highway contract speeds.
- (12) Yes, this was factored in with the Buffer Times that were part of the model.



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DBP/USPS-12

- (a) Please provide a listing of all facilities that will normally consolidate their mail on a given day by shipping it to another facility for processing, such as Hackensack NJ 076 sending all mail to Paterson NJ 074/075 on Saturdays.
- (b) Please provide a listing of all facilities that normally process outgoing mail on Sunday.

RESPONSE:

Objections filed.

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DBP/USPS-13.

Please confirm, or explain if you are unable to, that the service standards are the same for any given Origin-Destination ZIP Code pair regardless of:

- (a) The day of the week the article is mailed.
- (b) The method that is utilized to pay postage on the article, such as, stamps, postage meters, permit imprints, etc.
- (c) The method that is utilized to address the article, such as handwritten, hand printed, typed, printed, with or without a bar code, etc.
- (d) The shape and type of the article, such as, cards, machinable envelopes, non-standard envelopes, flats, parcels, rolls, etc.
- (e) Whether, or not, the article has any additional services, such as Certified or Registered Mail.

RESPONSE:

- (a) Yes, they are the same (taking into account non-delivery days such as Sunday and holidays).
- (b) Yes, they are the same.
- (c) Yes, they are the same.
- (d) Yes, they are the same.
- (e) Yes, they are the same.

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DBP/USPS-14.

Please advise the various categories, such as those mentioned in DBP/USPS-13,  
for which the Postal Service has separate data for

(a) EXFC results.

(b) ODIS results.

RESPONSE:

(a&b) Objection filed.

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DBP/USPS-15

Please confirm, or explain if you are unable to, that for any given P&DC, the service standards are the same regardless of where the article is mailed, so long as it is entered into the system on the day of mailing in an area that is under the jurisdiction of that P&DC.

RESPONSE:

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 Phase 2 changes initiated during FY-2000 and FY-2001. 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.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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DBP/USPS-16.

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses.

- (a) Please advise the minimum area that may be included in an area that is receiving overnight service from a given P&DC. For example, may it be limited to a 5-digit ZIP Code, a 3-digit ZIP Code prefix, all of the 3-digit ZIP Code prefixes under the jurisdiction of a given P&DC, the area under the jurisdiction of a given ADC, etc.?
- (b) Same as subpart a, except for an area that is receiving 2-Day service.
- (c) Same as subpart a, except for an area that is receiving 3-Day service.

RESPONSE:

- (a) Overnight areas pre- and post-Docket No. N89-1 generally were defined in that proceeding as "Intra-SCF." Overnight areas today are the functional equivalent.
- (b) See PRC Op. N.89-1 at 5, which summarizes the pre- and post-N89-1 criteria for defining 2-day areas. See also, the materials referenced at page 7 of the July 30, 2001, USPS Motion to Dismiss filed in this proceeding.
- (c) 3-day areas have been and continue to be those which are not 1-day or 2-day.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

DBP/USPS-17

- (a) Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has an overnight delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in two or more day service.
- (b) Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has a 2-Day delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in three or more day service.

RESPONSE:

- (a) Objection filed.
- (b) Response forthcoming.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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DBP/USPS-18.

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses.

- (a) To what extent is reciprocity considered or utilized between two P&DC facilities that are overnight to each other. Namely, if P&DC B receives overnight service from P&DC A, what is the status of P&DC A receiving overnight service from P&DC B?
- (b) Same as subpart a except with respect to 2-Day service.
- (c) Same as subpart a except with respect to 3-Day service.

RESPONSE:

- (a) Objection filed.
- (b&c) See the July 30, 2001, Gannon Declaration, at ¶30. Due to the fact that the exchange of mail in the postal network involves the crossing of time zones, and that the network design, based on volume flows, is not “square” (i.e., there are 174 Origin P&DCs, but only 88 ADCs), the concept of “reciprocity” was intentionally not applied. The results of using “reciprocal” Service Standards would have forced the Postal Service to take all the 2-Day vs. 3-Day non-reciprocal pairs and make them 3-Days in both directions in order to make them “reciprocal”, since, by definition, “advancing” 3-Day mail to 2-Days could not be achieved on a consistent and dependable basis. However, reciprocal 3-Days standards in both directions could be achieved. The Postal Service elected not to reduce the service to all those 2-Day pairs that occurred in “non-reciprocal pairs. It should be noted, however, that

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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RESPONSE to DBP/USPS-18 (continued):

the Service Standard changes that occurred in FY2000 and FY2001 reduced the amount of non-reciprocal pairs in the nation from 71,382 down to 38,584 pairs, a nationwide reduction of 46%.



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DBP/USPS-19.

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses.

- (a) To what extent is the volume, either an absolute volume or a percentage of the total volume, of mail from a given facility that is destined to another facility considered or utilized in evaluating those areas that will receive overnight service? Provide details of the volume or percentage levels.
- (b) Same as subpart a except with respect to 2-Day service.

RESPONSE:

- (a) Objection filed.
- (b) Volume between P&DC and ADC pairs was not a factor considered during the FY2000-01 finalization of Phase 2 of the service standard realignment plan.

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DBP/USPS-20

Please discuss when Tours 1, 2, and 3 of a processing plant normally operate and the functions that are assigned to each of the three tours.

RESPONSE:

Objection filed.

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DBP/USPS-21.

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses.

- (a) To what extent should the existence of adjacent with contiguous borders 3-digit ZIP Code areas exist with a service standard of 3-Days between them (this would mean that “next-door neighbors” would have 3-Day delivery service standards between them)?
- (b) To what extent do local postal facilities circumvent the normal processing plan and exchange mail with that adjacent area so as to achieve overnight service in those instances where it would normally be three days?

RESPONSE:

- (a) To an extent reasonable under the circumstances.
- (b) The Postal Service has no measure of the extent to which such activity occurs.

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DBP/USPS-22

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. To what extent is it desired to have all mail destined to locations within the same state as either overnight or 2-Day service standards?

RESPONSE:

To the extent that it was consistent with the service standards existing at the time of Docket No. N89-1, it was desired to have all mail destined to locations within a state as either overnight or 2-Day. It is currently desirable, to the extent that it is consistent with current service standards, which are different than those in effect when Docket No. N89-1 was initiated.

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DBP/USPS-23

Please furnish a copy of the service standards that existed at the time of Docket N89-1 as well as copies of all versions that have been released since that time. Please provide an explanation of the types and extent of changes that occurred between each of the versions provided.

RESPONSE:

The service standard directory is overwritten every postal quarter. CD-ROM copies of earlier quarterly versions are not routinely archived. It is impossible to reconstruct all of the changes that have been made among the over 800,000 3-digit ZIP Code origin-destination pairs since the time of Docket No. N89-1. There are no computerized records of the service standards for all ZIP Code pairs in existence at that time. The current proceeding is about changes that took place in FY2000 and FY 2001, which are apparent by examination of DFC-LR-1.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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DBP/USPS-24.

Please refer to Paragraph 15 of the Gannon Declaration as it refers to the use of commercial air transportation service.

- (a) Provide a definition of the term “commercial air transportation service.”
- (b) Prior to the changes that were implemented in the past two years, please advise the percentage of 2-Day mail that was transported by surface, by commercial air transportation service, and by other means (specify the means and provide separate data for each means that transports 1% or more of the total volume).
- (c) Same as subpart b except for current data.
- (d) Same as subparts b and c except for 3-Day mail.
- (e) Provide details and specific data over at least the past five years which will demonstrate the level of reliability of commercial air transportation.
- (f) Explain why the loss of reliability had a more significant impact on 2-Day mail. Also please state what the word “more” refers to.

RESPONSE:

- (a) In this context, the term is used to refer generally to private air service other than that which is dedicated by contract primarily or exclusively to the transport of mail. Passenger airlines which also transport mail in their cargo holds are an example of “commercial air transportation service” utilized by the Postal Service.
- (b) Response forthcoming.
- (c) Response forthcoming.
- (d) Response forthcoming.
- (e) Response forthcoming.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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RESPONSE to DBP/USPS-24 (continued):

- (f) A delay in air transportation is more likely to adversely affect 2-day mail than 3-day mail because, for the former, there is a narrower window within which to execute "Plan B" (to catch the next available flight) in an effort to meet the service standard than with 3-day mail.

In the first instance, the word "more" is used in reference to the word "erratic." In the second instance, it is used in reference to the word "significant." It is not clear what is intended by this part of the question.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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DBP/USPS-25

Please refer to Paragraph 24 of the Gannon Declaration.

- (a) Please provide a copy of the referenced presentation, in the form of PowerPoint slides.
- (b) Please provide copies of any other memoranda or directives that were utilized in the finalizing the 2 and 3-Day Service Standard effort.

RESPONSE:

- (a) A redacted copy was filed with the Commission by the Complainant. See DFC-LR-1.
- (b) As soon as a search of relevant files is completed, any responsive documents will be reviewed and determinations made regarding disclosure.



RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

DBP/USPS-26

In regard to the Service Commitments / performance goals for First-Class Mail, with regard to the delivery standards realignment that took place as a result of Docket N89-1 along with the experimental [which became permanent on September 23, 1989] realignment that took place prior to that in the Metropolitan New York City area, what percentage of the mail profile prior to that Docket and experiment shifted from:

- (a) one-day to two-day delivery,
- (b) one-day to three-day delivery,
- (c) two-day to one-day delivery,
- (d) two-day to three-day delivery,
- (e) three-day to one-day delivery, and
- (f) three-day to two-day delivery?
- (g) What were the purposes of this realignment?
- (h) Did this realignment result in an increase in or a savings of costs associated with the mail processing and transportation (or any other areas)?
- (i) If so, provide the yearly change in costs for each year since the change.
- (j) Did this realignment result in a change in the consistency of mail delivery?
- (k) If so, provide the data for each year since the change.
- (l) Is there a specific request to the mailing public at regular intervals to inquire about potential changes desired in delivery standards?
- (m) If so, explain and provide details. If not, explain why not.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

RESPONSE to DBP/USPS-26:

- (a-f) Other than files generated during the course of the litigation of Docket No. N89-1, the Postal Service has been unable to locate responsive records from the early 1990's related to the implementation of Phases 1 and 2 of the realignment plan.
- (g) The stated purposes of the realignment are summarized in PRC Op. N89-1, as well as the Docket No. N89-1 testimonies referenced in response to DBP/USPS-9(a) sand at pages 6-7 of the July 30, 2001, USPS Motion to Dismiss filed in the instant proceeding .
- (h) See the response to OCA/USPS-11, filed today.
- (i) See the response to OCA/USPS-11, filed today.
- (j) See the response to (a) above. Nor have any records been located from the mid-90's or later that would reflect any analysis of a before-and-after change in consistency.
- (k) See the responses to parts (a) and (i) above. Nor have any records been located from the mid-90's or later that would reflect year-to-year analysis of any change in consistency.
- (l) No.
- (m) None has been deemed necessary.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

DBP/USPS-27

- (a) Confirm in general that air transportation will be more costly than surface transportation.
- (b) Confirm in general that air transportation will provide more expeditious service than surface transportation.
- (c) If not, explain.
- (d) Is air transportation utilized in all instances where it would advance the delivery time for First-Class Mail by one or two days over that which may be obtained by utilizing surface transportation in whole or in part?
- (e) If not, why not and explain how the handling of this mail could be considered to be handled expeditiously.
- (f) Provide copies of any regulations, directives, or memoranda issued at Area or above level which specify when to utilize air transportation service.
- (g) Provide copies of any press releases, directives, or other memoranda which were issued at the Headquarters level to indicate the level of service that would be provided to First-Class Mail at the time that Air Mail was eliminated as a separate domestic service some twenty years ago.
- (h) Does the level to which air transportation is utilized today match the level that was stated when Air Mail was eliminated as a separate service?
- (i) If not, explain how and why it does not.

RESPONSE:

- (a) Yes, in general, air transportation will be more costly than surface transportation.
- (b) No, that statement is not uniformly correct.
- (c) One impacting factor, for instance, is the specific distance between the cities involved. Example: Pittsburgh PA P&DC clears their Originating 2-Day mail destined for Buffalo NY at 02:30 AM. Theoretically, they could have a

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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RESPONSE to DBP/USPS-27 (continued):

surface trip going directly to the Buffalo P&DC which departs at 02:30. The projected drive time to Buffalo is 4.4 hours (4 Hours & 24 minutes), thus putting the projected arrival time at the Buffalo P&DC at 06:54.

In order to route the same mail by air, there is an actual surface trip to the Pittsburgh AMC departing, also, at 02:30. The trip arrives at the Pittsburgh AMC at 03:05. There is a highway to air carrier transfer time of 1 hour for processing through the AMC. There is a 0:35-minute minimum time prior to the departing flight that the airlines require to handle the mail. This would put the mail available for flights departing sometime after 04:40. The very first flight available to Buffalo is US Air-446 departing at 08:35 and scheduled to arrive at Buffalo at 09:32. Once at the Buffalo airport, US Air has 1:40 hours (including the buffer) to bring the mail to the AMC. The AMC then has a minimum of 20 minutes to get the mail ready for transportation going to Buffalo P&DC. That makes the mail available for transportation at 11:32. The first scheduled surface trip from the AMC leaves at 11:40 and arrives at the Buffalo P&DC at 12:05. Aside from the very real issues of airline dependability, this puts the mail in question at the processing plant 5 hours and 11 minutes after the surface trip...that is, if everything works exactly right through the air network in a “best case” scenario. Obviously, this would not be the case on a Pittsburgh to Los Angeles trip, but it clearly demonstrates that a 57-minute flight is not “more expeditious” than, in this case, a 4 Hour & 24 minute surface trip.

- (d) In all likelihood, not.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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RESPONSE to DBP/USPS-27 (continued):

- (e) In the same manner that the question in subpart (b) recognizes that there are degrees of expedition (“plain” expedition and “more” expedition) which contribute to the expeditious level of service experienced by First-Class Mail.
- (f) The search for responsive document continues. As soon as they are compiled, they will be reviewed and disclosure determinations will be made.
- (g) Objection filed.
- (h) The levels are probably not the same, but there are no records available that would permit a very precise comparison.
- (i) N/A

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DBP/USPS-28

- (a) Does the USPS have a requirement that all mail which is placed into the system on a given day will be postmarked that day and will be processed that same day?
- (b) Does the USPS have a requirement that all mail turned in over a service window that is open to the public will be postmarked that day and will be processed that same day?
- (c) Does the USPS have a requirement that all mail turned into a city delivery, rural, or HCR carrier or which is collected by a carrier will be postmarked that day and will be processed on that day?
- (d) Does this apply to all delivery dates including Saturday?
- (e) Explain and elaborate on any negative answers.

RESPONSE:

Objection filed.

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DBP/USPS-29

Please confirm, or explain if you are unable to do so, that Day 0 with respect to the determination of the services standards being either 1-, 2-, or 3-Days will be:

- (a) Mail which is presented to a retail service window clerk up to the time of the closing of the window.
- (b) Mail which is turned into or collected by a city delivery, rural, or HCR carrier on a given day.
- (c) Mail which is deposited in a collection box up to the time of the latest collection time shown on that box.
- (d) Mail which is turned in at a post office platform up to the designated time.

RESPONSE:

Confirmed.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

DBP/USPS-30.

Please identify and provide copies of any USPS Inspection Service, USPS Inspector General, or General Accounting Office reports that have been issued with respect to service standards of First-Class Mail.

RESPONSE:

If any reports pertaining to the administration of or changes in service standards are identified, they will be examined for the purposes of making expeditious disclosure determinations.



## 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:

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