

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-31-55]

October 13, 2001

Pursuant to Order No. 1320, I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

Respectfully submitted,

October 13, 2001 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-31 Please refer to your response to DBP/USPS-1 subpart d, does the travel time clock start when the mail is "Ready for final dispatch", or when the DOV actually leaves the facility?

DBP/USPS-32 Please refer to your response to DBP/USPS-2 subpart d, in addition to ADCs, do P&DCs also have a Critical Entry Time?

DBP/USPS-33 Please refer to your response to DBP/USPS-3 subpart b, please provide a listing of the official exemptions that have been provided by Headquarters and the justification for each exemption.

DBP/USPS-34 Please refer to your response to DBP/USPS-4 subparts a and b, please confirm that for 2-Day and 3-Day service standards, the standards will apply to an entire destination ADC area.

DBP/USPS-35 Please refer to your response to DBP/USPS-8 subpart b, please explain what is meant by the expression "as mapped by our "GOEZINTA-list"."

DBP/USPS-36 Please refer to your response to DBP/USPS-8 subpart c, based on the latest Clearance Time of 2:30 AM for 2-Day mail and the earliest Critical Entry Time of 6 PM, please explain why 12 hours was chosen as the maximum drive time when there is a minimum 15-1/2 hour period between the CT and CET.

DBP/USPS-37 Please refer to your response to DBP/USPS-11 subpart b, please provide a listing of the 17 "outliers" including the facility they are associated with and their CT/CET.

DBP/USPS-38 Please refer to your response to DBP/USPS-11 subpart c, [a] please confirm, or explain if you are unable to do so, that the Postal Service will include in its contract with organizations that transport the mail between facilities a minimum speed at which the vehicles are to be operated at. [b] Please confirm, or explain if you are unable to do so, that, on average, the contracted speed will be over 19% less than the speed limit established for that road. For example, if the authorized speed limit is 55 MPH, the Postal Service will contract for that route to be driven at, on average, 44.55 MPH.

DBP/USPS-39 Please provide copies of those records that are available over the past two-year period which show the actual time utilized for various trips by the organizations that transport mail between facilities [at or above the P&DC level] as compared to the calculated value. I would like to be able to compare the reliability of the computer program in determining the travel time between two facilities.

DBP/USPS-40 Please refer to your response to DBP/USPS-11 subpart d, please explain why each of the five items that are not considered and utilized are not utilized.

DBP/USPS-41 Please refer to your response to DBP/USPS-18 subparts b and c, please reconcile the difference between the claim that volume flows are related to why reciprocity was not considered while the response to DBP/USPS-19 states that volume was not a factor.

DBP/USPS-42 Please refer to your response to DBP/USPS-18 subparts b and c, please explain how the “not square” concept of the network will affect the consideration of reciprocity since each of the 88 ADCs will have one or more P&DCs associated with it and reciprocity could apply to all P&DCs in that ADC.

DBP/USPS-43 Please refer to your response to DBP/USPS-26 subpart l, please provide a response with respect to the conditions that existed at the time of Docket N89-1 and the reasons for eliminating the inquiry of public input for service standards.

DBP/USPS-44 Please refer to your response to DBP/USPS-26 subpart m, please provide specific details why the Postal Service feels that it is not important to obtain public input regarding service standards.

DBP/USPS-45 Please refer to your response to DBP/USPS-27 subparts b and c, please confirm that in general air transportation will provide more expeditious service than surface transportation for distances beyond the nearby area. Provide your definition of beyond the nearby area that will allow you to confirm this statement. If not, please explain.

DBP/USPS-46 Please refer to your response to DBP/USPS-27 subparts d and e, please provide a listing of those origin-destination pairs where air transportation is utilized to 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 and thereby

achieving a service standard of overnight or two days. Information on the use of air transportation to achieve a 3-Day service standard is not desired.

DBP/USPS-47 Please refer to your response to DBP/USPS-27 subparts d and e, please provide a listing of those origin-destination pairs where air transportation is not utilized to 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. The information desired are those pairs where there is currently either a 2-Day service standard that could be converted into an overnight service standard by the use of air transportation in place of the existing surface transportation or a 3-Day service standard that could be similarly converted into an overnight or 2-Day service standard.

DBP/USPS-48 Please refer to your response to DBP/USPS-27 subpart e, please explain how the handling of the mail in those areas provided in response to DBP/USPS-47 could be considered to be handled expeditiously.

DBP/USPS-49 The September 2001 *Memo to Mailers* on page 7 states that the shared air transportation network with FedEx Express will be used to transport First-Class Mail on its day network effective August 27th. [a] What effect will this have on the existing service standards? [b] In what categories [such as 3-Day mail, improving 3-day mail to 2-Day mail, etc] of standards will this network be used? [c] Provide a listing of those cities where First-Class Mail is now carried on this system. [d] What improvement in reliability and consistency of service is expected?

DBP/USPS-50 An article appearing in the October 3, 2001, issue of *The Flint [Michigan] Journal* states that the Flint P&DC was not one of the 24 centers recommended for the initial round of closings. [a] Please provide a listing of those processing facilities that are scheduled to be closed [include the date of proposed closing and the facility that will take over the processing]. [b] Please discuss the plans for any other consolidations or closing of processing facilities.

DBP/USPS-51 The EXFC results for 2001 PQ4 covering May 19, to September 7, 2001 shows that 93.96% of the nation's mail scheduled for overnight delivery arrives on time. [a] Does this show reliable and consistent mail service? [b] Please provide your reasons for the response to subpart a. [c] Please explain the reasons why 6.04% of the mail does not arrive on time [provide a relative level of significance of each of the reasons].

DBP/USPS-52 The EXFC results for 2001 PQ4 covering May 19, to September 7, 2001 shows that 86.08% of the nation's mail scheduled for 2-Day delivery arrives on time. [a] Does this show reliable and consistent mail service? [b] Please provide your reasons for the response to subpart a. [c] Please explain the reasons why 13.92% of the mail does not arrive on time [provide a relative level of significance of each of the reasons].

DBP/USPS-53 The EXFC results for 2001 PQ4 covering May 19, to September 7, 2001 shows that 83.18% of the nation's mail scheduled for 3-Day delivery arrives on time. [a] Does this show reliable and consistent mail service? [b] Please provide your reasons for the response to subpart a. [c] Please explain the reasons why 16.82% of the mail does not arrive on time [provide a relative level of significance of each of the reasons].

DBP/USPS-54 The Service Standards CD-ROM for Fiscal Year 2002 - Quarter 1 has just been released. [a] Please provide a copy as a library reference. [b] Please provide a listing of all changes [Originating P&DC ZIP & Name / Origin 3-digit ZIP / Destinating ADC ZIP & Name / 3-digit ZIP / Upgrade/Downgrade / Existing Service Standard / New Service Standard] appearing on this version as opposed to the previous version. [c] Please explain the reasons for making the changes listed in your response to subpart b.

DBP/USPS-55 Please refer to Paragraph 18 of the Gannon Declaration as it relates to the building of a computer model. Please provide a listing of each originating

P&DC facility to destinating ADC facility path that [a] has a time of 12.049 hours or less between them and are presently receiving 3-Day delivery standards and [b] has a time of greater than 12.049 hours between them and are presently receiving 2-Day delivery standards. Also provide similar data for any special arrangements that are similar to the normal P&DC-ADC path but are different types of facilities.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

October 13, 2001

David B. Popkin