

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

REVISED RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-5(a)&(b-partial), 6(b-partial), 7(a,b), 8(d), 10(d1), 11(b,c), 16(a), 17(a,b),
18(a), 19(a), 24(b-d), 26(a-f) and 28)

The United States Postal Service hereby files revised responses to the following
following interrogatories of David Popkin: DBP/USPS-5(a)&(b-partial), 6(b-partial),
7(a,b), 8(d), 10(d1), 11, 16(a), 17(a,b), 18(a), 19(a), 24(b-d), 26(a-f) and 28.

The revised responses supersede the responses originally filed on October 4,
2001.

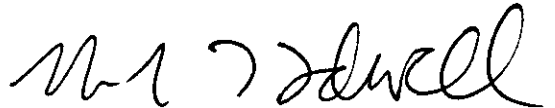
Each interrogatory is stated verbatim and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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) Yes, all P&DCs have CTs.**
- (b) Yes, CT's apply to intermediate facilities. An objection to disclosure of the Clearance Times for each intermediate facility has been filed.**
- (c) N/A**

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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) A listing of the facilities is in USPS-LR-C20001-3/1, file OCA12B2. An objection to the provision of each facility's CETs has been 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 subfacilities. 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) No. Each ADC has a specific single facility CET that applies to all incoming ADC mail, which allows adequate processing time prior to the Dispatch of Value to downstream subordinate SCFs, (P&DCs, P&DFs CSFs, and other facilities designated as SCFs) in order to meet the CETs for those facilities.
- (b) N/A

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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 as part of DFC-LR-1. The CT at a given P&DC was not chosen as the starting time of the 12-hour time frame. The 2 & 3-Day Model calculates that the 12-hour drive time "clock" starts at 02:30, irrespective of the individual Clearance Times of the individual originating facilities or the CET of the destinating ADC.
- (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) The search for responsive documents has been completed. None has been located. Consultations with personnel involved lead to the conclusion that all pertinent communications were either conducted in face-to-face meetings or over the telephone.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-10

Revised 10/22/01

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.
- (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.

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Response to DBP/USPS-10 (continued):

- (d1) Confirmed.**
- (d2) The same question was essentially asked as part of DBP/USPS-55.
Responsive information is being compiled and will be filed in response to
that interrogatory.**
- (e1) The same question was essentially asked as part of DBP/USPS-55.
Responsive information is being compiled and will be filed in response to
that interrogatory.**
- (e2) N/A**

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-11

Revised 10/22/01

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 discuss all of the criteria that were used in building the computer model.**
- (c) 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.**
- (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):

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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):

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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 "GOEZINTAlist") 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.

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RESPONSE to DBP/USPS-11 (continued):

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- (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% 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

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RESPONSE to DBP/USPS-11 (continued):

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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 wallclock 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.

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.**

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RESPONSE to DBP/USPS-11 (continued):

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- (12) Yes, this was factored in with the Buffer Times that were part of the model.**

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DBP/USPS-16.

Revised 10/22/01

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, at a minimum. To examine existing overnight areas, examine the CD-ROM Service Standards map filed as part of DFC-LR-1.**
- (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.**

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DBP/USPS-17

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- (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) Currently, none.
- (b) Every First-Class Mail 2-day service standard is established with the expectation that surface transportation can be used to effect 2-day delivery. Air transportation is used instead for specific 2-day origin-destination pairs when it is more economical to do so and where adequate air service is available.

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

Revised 10/22/01

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) There has been no policy of mandatory reciprocity.
- (b&c) There has been no policy of mandatory reciprocity. 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 in the contiguous 48 states), 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.

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RESPONSE to DBP/USPS-18 (continued):

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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, 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%.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-19.

Revised 10/22/01

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) It has not been a factor.**
- (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. There are no remaining records related to the initial implementation of Phase 2 to indicate the extent to which it was a factor at that time.

Current policy regarding the extent to which volume is a factor is reflected in the 2-day service standard definition, which is quoted on page 7 of the July 30, 2001, USPS Motion to Dismiss.**

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

Revised 10/22/01

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-d) No transportation data exist which separate mail volume for a particular mail class on the basis of the service standard applicable to portions of that mail.**
- (e) Response materials will be filed as USPS Library Reference C2001-3/2.**

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RESPONSE to DBP/USPS-24 (continued):

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- (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.

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DBP/USPS-26

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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.**

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RESPONSE to DBP/USPS-26:

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- (a-f)** Other than files generated during the course of the litigation of Docket No. N89-1 which may contain some general projections about what might happen, the Postal Service has not been able to locate any records generated after that proceeding that may have measured the actual shifts that resulted from the implementation of Phases 1 and 2 of the realignment plan that occurred in the early 1990's.
- (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) and 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
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DBP/USPS-28

Revised 10/22/01

- (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:

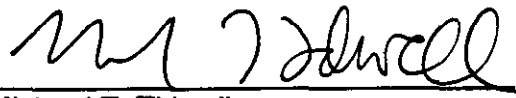
- (a) No. For instance, in this scenario, mail could be deposited in a collection box hours after the final pick-up and not picked up, postmarked and processed until the next day.**
- (b) No. Mail that is deposited in the evening at a late night service window could be postmarked at the window, but still not processed until after midnight. If it is deposited there in bundles or trays, it may be placed in a hamper, but not be postmarked on a facer-canceler and processed until after midnight.**
- (c) Yes.**
- (d) Yes.**
- (e) See answers above.**

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
Englewood NJ 07631-0528

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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October 22, 2001