

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

DAVID B. POPKIN
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-56-69]

October 20, 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 20, 2001 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-56 Please refer to the Library Reference USPS-LR-C2001-3 / Policy for requesting a Service Standard Change. [a] The heading indicates that this document is as outlined in Option #26 of the Service Standard Directory on the Corporate Information System. Please provide a copy of the complete Directory. [b] Refer to the definition of Service Standard where it states that it is an expectation to deliver a piece of mail WITHIN a prescribed number of days. If the Service Standard is two days and the article is delivered overnight, has this expectation been met? [c] If the Service Standard is three days and the article is delivered either overnight or in two days, has this expectation been met? [d] Provide a complete discussion as to why the definition of Service Standard uses the words "within a prescribed number of days" rather than the words "on the scheduled day of delivery", or words of similar import. [e]

Has the definition of Service Standard always used the concept of "within the prescribed number of days" going back to the time of Docket N89-1? [f] If not, please provide the definitions that were utilized, the time period of their use, and the reasons for change. [g] Please fully describe the requirements to the customer to meet the term "after proper deposit by the customer." in order to achieve the timely delivery of their mail. [g] Please provide a copy of the most recent "Service Standard Directory" as defined in this reference. [h] Please advise when the mileage data in the Service Standard Directory will be corrected. [i] Please advise when the Network Data in the Service Standard Directory will be reinstituted. [j] Please furnish a listing of all changes to the standards that existed at the approval of Docket No. N89-1 that have been made through the process described in this Policy.

DBP/USPS-57 [a] Is there any written material that provides guidelines for the present criteria that is utilized to convert the DMCS requirement for First-Class Mail receiving expeditious handling and transportation [DMCS 252] to the actual 1-, 2-, or 3-day delivery standard? If so, please provide copies. If not, please explain how decisions on requested changes are evaluated. [b] Please provide details on the distinctions that are made between the Letters and Sealed Parcels and Cards subclasses and the Priority Mail subclass which have different service standards but are all covered by the same DMCS requirement for expeditious handling and transportation.

DBP/USPS-58 [a] Please refer to the first paragraph on page 2 of the Policy for requesting a Service Standard Change and provide examples of those types of documentation which would support the moving of overnight offices to 2-day standards. [b] Please provide examples of documentation which would not support making changes. [c] Please discuss the effect of cost on making the evaluation for changes. This should include capital expenditures as well as manpower and transportation costs.

DBP/USPS-59 The Policy for requesting a Service Standard Change makes numerous references to customer relations areas such as, "needs of the customer", "improve customer satisfaction", "public perception", and "public relations impact."

Please explain how any reduction in services standards could be perceived by the public as being an improvement in service.

DBP/USPS-60 Please refer to paragraph b on page 4 of the Policy for requesting a Service Standard Change and provide a copy of the most current "Customer Needs" information that is available in Product Management or Consumer Affairs.

DBP/USPS-61 Please refer to the example in paragraph 2 on page 2 of the Policy for requesting a Service Standard Change as it refers to processing in the 210-212 ZIP Code area. [a] Please confirm that ZIP Codes 210 and 211 are for Maryland cities served out of the Baltimore Processing Plant and that ZIP Code 212 is for the city of Baltimore and is also served out of the same plant. [b] Please confirm that some or all incoming mail for ZIP Codes 210-212 will be commingled on arrival at the plant. [c] Please confirm that the completion of processing of the incoming mail for both the Baltimore city ZIP Code 212 and the associated offices mail ZIP Codes 210 and 211 will be completed at the same time. [d] Explain how the mail for ZIP Code 212 can have a service standard that would cause it to be delivered either a day before or a day after the mail which is going to the associate offices with ZIP Codes 210 and 211. [e] Would the Baltimore city ZIP Code, 212 in this case, have a faster or slower delivery standard than the associated offices, 210 and 211 in this case? [f] Confirm that there are some processing plants, such as Hackensack NJ 076, where both the city and the associated offices share the same 3-digit ZIP Code prefix and therefore would be required to have the same delivery standards. [g] Provide a complete listing of those instances where outgoing mail from a specific processing facility receive different standards for different originating areas under the same facility. [h] Same as subpart g, except for incoming mail to the specific facility.

DBP/USPS-62 Define and explain the term NASS used in paragraph d on page 3 of the Policy for requesting a Service Standard Change.

DBP/USPS-63 Refer to paragraph a on page 4 of the Policy for requesting a Service Standard Change, does the word "adequate" refer to both air and surface transportation?

DBP/USPS-64 Refer to the Headquarters letter regarding Speed Limits. Have the data been updated beyond the data for March 1, 1998 since I know, for example, the New Jersey speed limits have changed?

DBP/USPS-65 In the Library Reference, refer to the comment at the top of page K2mapq1 7/19 where it relates to "the Midwest did not request reciprocal changes". Is the decision to implement or not implement reciprocal changes left up to the area? What guidelines, if any, are they provided?

DBP/USPS-66 On page K2mapq1 12/19 it refers to 4 day model. [a] Please explain why four day modeling is utilized? [b] Are there any plans to increase the service standards beyond the existing 1-, 2-, or 3-days? If so, please provide complete details.

DBP/USPS-67 On page K2edq2 2/4 it refers to "fixing the Priority Mail slower than FCM problem." [a] Please provide details of the problem including specific ZIP Code pairs. [b] Has the problem been fixed? [c] If not, when will it be fixed?

DBP/USPS-68 The Postal Service has announced that an award of up to \$1 million is being offered for information leading to the arrest and conviction of those responsible for mailing letters containing anthrax such as those sent to Tom Brokaw at NBC and to U.S. Senator Tom Daschle. As a result of the mailing of letters containing anthrax as well as any changes made that affect the use of air transportation [including any restrictions imposed by the FAA], will any actions taken by the Postal Service affect the existing 1-, 2-, and 3-day Service Standards that are being litigated in this Docket? If so, please provide complete details on their effect.

DBP/USPS-69 Please refer to the Declaration of Charles M. Gannon filed on July 30, 2001 and the Second Declaration of Charles M. Gannon filed on August 21, 2001. [a] Is the autobiographical sketch information still current and up-to-date? [b] Is all of the other data in the declarations still current and up-to-date? [c] If not, please provide the updated information.

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 20, 2001

David B. Popkin