

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-70-82]

October 29, 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 29, 2001 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-70 Please refer to your response to DBP/USPS-8 subpart a. Please explain and discuss why the 12-hour drive time "clock" starts at 2:30 AM irrespective of the individual Clearance Time of the specific facility.

DBP/USPS-71 Please refer to your response to DBP/USPS-8 subpart b. [a] Are vehicles required to utilize the "most appropriate surface route" as determined by the PC Miler software or are they able to utilize any route? [b] Please discuss that extent to which it is believed that vehicles do not utilize the "most appropriate surface route" and how that would affect the travel time between the two facilities. [c] Please provide a listing of those instances where different travel routes are utilized and the effect on the travel time.

DBP/USPS-72 Please advise how the use of other forms of transportations, such as train, will be covered in the travel times calculated by the PC Miler software and how the Service Standards determined as a result of those times will be affected.

DBP/USPS-73 Please refer to your response to DBP/USPS-8 subpart c. [a] Please explain why a travel time of 12.05 hours [and therefore, as well, any number greater than this] would not result in obtaining 2-Day delivery in a consistent and dependable fashion. [b] Fully define and discuss the criteria and considerations that are considered or utilized in determining whether the meeting of a delivery standard could be considered to be obtained in a consistent and dependable fashion.

DBP/USPS-74 Please refer to your response to DBP/USPS-8 subpart b. Please discuss how crossing a time zone boundary will affect whether the Service Standard is 2 or 3 days. For example, does it allow for 13 hours drive time when heading west while limiting it to 11 hours drive time when heading east in order to be considered for a 2-Day standard?

DBP/USPS-75 Please refer to your response to DBP/USPS-8 subpart d. Please have the personnel involved provide their explanation and discussion as to the determination of the 12-hour standard.

DBP/USPS-76 Please refer to your response to DBP/USPS-17 subpart a. [a] Please confirm that air transportation is not utilized between Honolulu and Hilo, Hawaii as well as other inter-island offices in Hawaii that have overnight service between them. [b] If you are not able to confirm, please explain and reanswer this interrogatory.

DBP/USPS-77 Please refer to your response to DBP/USPS-24 subparts b to d. [a] Prior to the changes that were implemented in the past two years, please have Mr. Gannon and/or other qualified employee advise their best estimate of 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]. [b] Same as subpart a except for current data. [c] Same as subparts a and b except for 3-Day mail.

DBP/USPS-78 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, please have Mr. Gannon and/or other qualified employee advise their best estimate of 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?

DBP/USPS-79 Please refer to your response to DBP/USPS-28 subpart a. [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. For purposes of this response, assume that the phrase "placed into the system" is defined with respect to collection boxes to mean deposited prior to the final collection time shown for the given day. [b] Explain and elaborate on a negative response by providing examples of all generalized scenarios which mandated the negative response.

DBP/USPS-80 One of the anthrax releases refers to a Carteret, New Jersey, HASP. [a] What is the definition of HASP. [b] Please discuss how HASPs fit into the mail processing system.

DBP/USPS-81 Please explain why the mail originating in Tulsa, Oklahoma is able to achieve a much greater area than the mail which is destinating at Tulsa.

DBP/USPS-82 In Docket No. N89-1, Witness John Potter testified to the percentage of First-Class Mail that was subject to overnight, 2-Day, and 3-Day service standards. What is the current percentage breakdown?

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 29, 2001

David B. Popkin