

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

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
DAVID POPKIN  
(DBP/USPS-31 THROUGH 37, 41, 42, 44 THROUGH 46, 48, AND 51 THROUGH 55)

The United States Postal Service hereby files its responses to the following interrogatories of the David Popkin that were filed on October 15, 2001: DBP/USPS-31 through 37, 41, 42, 44 through 46, 48, and 51 through 55.

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

Objections to DBP/USPS-39, 49 and 50 were filed on October 22, 2001.

The responses to DBP/USPS-38, 43 and 47 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

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Michael T. Tidwell  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
mtidwell@email.usps.gov  
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RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

**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?

**RESPONSE:**

Neither. The Drive Time “clock” starts for all Originating P&DCs at 02:30, Day 1. It works in conjunction with the Buffer Times that are outlined in the PowerPoint presentation included in DFC LR-1. As described in that document, the Drive Time, plus the Buffer Time (2.5 or 3.5 hours, depending on the length of the trip), equals the Expected Time of Arrival (ETA) at the Destination ADC.

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

**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?

**RESPONSE:**

While the destinating Critical Entry Times at P&DCs, which are subordinate to Area Distribution Centers, are not specifically a part of the 2 & 3-Day Model calculations, yes, P&DCs do have CETs regarding the planned arrival of mail from their Parent ADCs.

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

**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.

**RESPONSE:**

See USPS LR C2001-3/3 , file DBP-33 for the Clearance Time exceptions, and justifications, in place for the implementation of the 2 & 3-Day Service Standard Model.

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

**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.

**RESPONSE:**

Yes, 2 & 3-Day standards are applied consistently to an entire destination Area Distribution Center area.

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

**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”.

**RESPONSE:**

As noted in response to DBP/USPS-11, the GOEZINTA list is the “Organizational Structure List”. It is a table which maps the inter-relationships between the Processing & Distribution Centers (P&DCs), Processing and Distribution Facilities (P&DFs), Customer Service Facilities (CSFs), Area Distribution Centers (ADCs), Automated Area Distribution Centers (AADCs) and Sectional Center Facilities (SCFs) in our Originating and Destinating networks and is part of the 2 & 3-Day Model.

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

**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.

**RESPONSE:**

As outlined in the PowerPoint presentation in DFC LR-1, the 2 & 3-Day Model includes designated Buffer Times of either 2.5 or 3.5 hours, depending on the length of the trip. When one adds the 12 hours Drive Time to the 3.5 hours Buffer Time, the total is the "15-1/2 hour period" cited. These Buffer Times allow for multiple stops, dock transfers, and handling through the transportation network, while still allowing the Postal Service to meet the designated Estimated Time of Arrival/Critical Entry Time at the destination Area Distribution Center.

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

**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.

**RESPONSE:**

See USPS LR C2001-3/3, file DBP-37 for the Originating Outlier exceptions. Since they are only Originating Exceptions, only CTs are applicable, therefore no CET information has been included in the referenced file.



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

**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.

**RESPONSE:**

The projected Drive Times generated by the use of the customized version of PC Miler closely matched the times by which the Postal Service currently contracts for surface transportation service. The elements cited (3, 5, 6, 7 & 8) were variables that were not offered as possible modifications within the PC Miler program.

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

**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.

**RESPONSE:**

The reference to “volume flows” in the response to DBP/USPS-18(b&c) speaks to the required presence of a specific level of volume that is necessary for the Postal Service to designate an individual destinating facility as an Area Distribution Center, of which we have 88 in the contiguous 48 states. However, the Postal Service has 174 Originating Processing & Distribution Centers. This is the aspect that is not “square” (88 x 174). All ADCs are also P&DCs, but all P&DCs are not ADCs.

The reference to “volume flows” in DBP/USPS-19 conversely speaks to the fact that the model used the existing P&DC/ADC network, therefore, whether an Origin P&DC or Destinating ADC was a “high volume” or “low volume” P&DC/ADC did not come into play at all. The same parameters were applied to all the facilities irrespective of their individual volume rankings.

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

**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.

**RESPONSE:**

The 2 & 3-Day Model used the 177 Origin Processing & Distribution Center to 88 Destinating Area Distribution Center network to determine those paired facilities which were within the 12-hour drive time.

**Example:**

As outlined as a matter of record as part of DFC LR-1, South Florida P&DC 330 is an Origin P&DC. It dispatches mail to ADC Columbia SC 290. The projected drive time is 11:36, therefore it was designated for a 2-Day standard. However, when Origin P&DC Columbia SC 290 routes mail back to ZIP Code 330, it is not dispatched to South Florida, because it is not a designated ADC. South Florida is a destinating SCF which falls under ADC Miami FL 331. The projected drive time between Origin P&DC Columbia SC 290 and ADC Miami FL 331 is 12:06, therefore Miami was designated as a 3-Day Service Standard, which includes the subordinate mail for SCF South Florida. So, in this example the ZIPs 330 & 290 are in the same Time Zone, but the “non-square” network structure means there are different standards between those particular ZIP Codes.

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

**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.

**RESPONSE:**

Please refer to the both the question and the response to DBP/USPS-26(m) and specifically indicate where any form of the word “important” appears. If you are unable to do so, then you can appreciate why the Postal Service is unable to respond to this particular follow-up interrogatory.

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

**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.

**RESPONSE:**

As indicated in the response to DBP/USPS-27, such an evaluation can only be made on a case-by-case analysis. Your question does not define what you consider to be a “nearby area” and the Postal Service has no such definition, accordingly it is impossible to provide a generalized response to your question.

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

**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.

**RESPONSE:**

In those instances where air transportation is used for 2-day mail, it is not used to “advance” delivery times, but to meet the applicable 2-day service standard. Therefore, there is no such list.

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

**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.

**RESPONSE:**

It would not be an unreasonable conclusion, taking into account all facts and circumstances. As implied by both the question and the response to DBP/USPS-27(e), there are relative degrees of "expedition." As made clear by the response to DBP/USPS-27(c), defining "expedition" to mean "transportation by air only" is simplistic, and does not always account for practical realities.

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

**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).

**RESPONSE:**

- (a) Yes.
- (b) The numbers speak for themselves.
- (c) The Postal Service has not conducted any analysis which would permit it to declare the relative significance of each reason why six percent of the mail was not delivered on time in 2001 Q4.



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TO INTERROGATORIES OF DAVID POPKIN

**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).

**RESPONSE:**

- (a) Yes, but to a lesser degree than for overnight mail, and suggesting twice as much room for improvement.
- (b) The numbers speak for themselves.
- (c) The Postal Service has not conducted any analysis which would permit it to declare the relative significance of each reason why 13 percent of the mail was not delivered on time in 2001 Q4.

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**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).

**RESPONSE:**

- (a) Yes, but to a lesser degree than for overnight mail, and suggesting 2.5 times as much room for improvement.
- (b) The numbers speak for themselves.
- (c) The Postal Service has not conducted any analysis which would permit it to declare the relative significance of each reason why seventeen percent of the mail was not delivered on time in 2001 Q4.

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

**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.

**RESPONSE:**

- (a) A copy has been filed as USPS Library Reference C2001-3/4.
- (b) There were no changes made to First-Class Service Standards between PQ 4-01 and PQ 1-02.
- (c) N/A

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TO INTERROGATORIES OF DAVID POPKIN

**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.

**RESPONSE:**

See USPS LR C2001-3/3 , file DBP-55.

## 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 1700  
Santa Cruz CA 95061-1700

David B. Popkin  
P.O. Box 528  
Englewood NJ 07631-0528

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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998/ FAX: -5402  
mtidwell@email.usps.gov  
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