

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 FOLLOW-UP INTERROGATORIES TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-83-91]

November 5, 2001

Pursuant to Order No. 1320, I hereby submit follow-up 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,

November 5, 2001 David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-83 Please refer to your response to DBP/USPS-36. [a] Please explain the conditions under which a buffer time of 2.5 hours is chosen vs. a buffer time of 3.5 hours. [b] Please explain why it is not possible to utilize a Drive Time of 13 hours in those instances where a buffer time of 2.5 hours exists and still maintain the total of 15-1/2 hours.

DBP/USPS-84 Please refer to your response to DBP/USPS-40. [a] For each of the five elements of Interrogatory DBP/USPS-11 subpart d that are not offered as possible modifications within the PC Miler program, namely, 3 [average speed on the actual trip], 5 [weather], 6 [time of day], 7 [day of week], and 8 [season of the year]. Please explain how the PC Miler program accommodates the variations of each of these five elements. Does it ignore the element? Does it use an average value? Does

it use a maximum condition? [b] Describe the modifications, if any, that the Postal Service utilizes to compensate for each of the five elements. [c] Confirm, or explain if you are unable to do so, that each of these five elements will have an effect on the drive time between the two points involved.

DBP/USPS-85 Please refer to your response to DBP/USPS-42. [a] Please confirm that the projected drive time of 12:06 hours between Origin P&DC Columbia SC 290 and ADC Miami FL 331 is 3 minutes and 3.6 seconds more than the cut-off time of 12.049 hours [the break-point between being 2-day and 3-day service standard]. [b] Please confirm that the projected drive time **from** the South Florida P&DC **to** the Columbia ADC is the same projected drive time in the reverse direction. [c] Same as subpart b except replacing the South Florida P&DC with the Miami P&DC. [d] Does the PC Miler program always utilize the same drive time from A to B as it does from B to A [other than in those instances where it compensates for crossing a time zone boundary]? [e] If not, please explain the compensation that it makes for direction of travel. [f] Please confirm that the Miami P&DC and ADC are co-located. [g] Same as subpart f except for the Columbia P&DC and ADC. [h] Please confirm that the Miami P&DC is located at 2200 NW 72nd Avenue in Miami. [i] Please confirm that the South Florida P&DC is located at 16000 Pines Boulevard, Pembroke Pines. [j] Please confirm that the projected drive time between Columbia and South Florida is 30 minutes less than the projected drive time between Columbia and Miami. [k] Please confirm that the South Florida P&DC is approximately 1.4 miles off of Interstate 75. [l] Please confirm that the Miami P&DC is approximately 0.6 miles off of the Palmetto Expressway. [m] What is the posted speed limit on the approximate 7.0 miles of the Palmetto Expressway and the approximate 9.3 miles of Interstate 75 that would be traveled between the two facilities? [n] What is the actual travel time for vehicles that transport mail between the South Florida and Miami facilities. If the time is different at different times of the day or week, provide a listing of the specifics. [o] At what point in the transportation process, if any, does mail destined for the Columbia ADC from the South Florida P&DC merge in its transportation with mail from the Miami P&DC? [p] Confirm that the service standards for South Florida P&DC are 2-day vs. 3-day for

Miami P&DC for mail destined to the Columbia SC, Atlanta GA, and Montgomery AL ADCs. [q] Provide the projected travel times between Atlanta and South Florida vs. Miami and between Montgomery and South Florida vs. Miami. [r] Please explain and discuss any subparts that you are unable to confirm.

DBP/USPS-86 Please refer to your response to DBP/USPS-46. [a] Please confirm that in those instances where air transportation is used for 2-day mail, had surface transportation been utilized in place of air transportation, it would still have been possible to meet the applicable 2-day service standard. [b] Please explain why air transportation is utilized instead of surface transportation in those instances. [c] If you are unable to confirm subpart a, please reanswer my original interrogatory DBP/USPS-46 as asked as well as explain and discuss. [d] Please provide a complete listing of those origin-destination pairs which have a service standard of overnight or two days where air transportation is utilized in part or whole.

DBP/USPS-87 Please refer to your response to DBP/USPS-33 and the associated Library Reference USPS LR C2001-3/3. [a] With respect to the 13 facilities that are not able to meet the National CT for **three**-day mail, either surface or air, what is the significance of this non-compliance so long as the mail for all of the country achieves delivery within three days? [b] For each of the 7 facilities that are not able to meet the National CT for 2-day mail, do they still utilize the same 12-hour drive time maximum? If not, please provide the drive time maximum for 2-day mail for each of the 7 facilities. [c] For each of the 7 facilities that are not able to meet the National CT for 2-day mail, please provide a listing of those ADCs that now receive 3-day service as opposed to receiving 2-day service if the facility met the National CT. [d] For each of the 2 facilities that are not able to meet the National CT for 1-day mail, please provide a listing of those ADCs that now receive 2-day service as opposed to receiving 1-day service if the facility met the National CT. [e] With respect to the 4 facilities in the Southeast Area, please advise the expected completion date for installation of the processing equipment and the ability to meet the National standards. [f] Are Minneapolis and St. Paul now in

compliance since the scheduled date was over a year ago? If not, what is the new expected date?

DBP/USPS-88 Please refer to your response to DBP/USPS-37 and the associated Library Reference USPS LR C2001-3/3. Your response to DBP/USPS-11[b] indicated that all mail that has been deposited in all facilities, including those that are within the 17 outlier facilities, by the locally determined posted times at mailboxes and post offices will meet the appropriate service standards. Now that the specific 2-day CTs have been provided and are as early as 18:30, I question whether these locally determined posted times meet the requirements of the Postal Operations Manual ["POM"]. [a] Please confirm that all of these locally determined posted times at mailboxes and post offices meet the requirements of the Postal Operations Manual. [b] In particular, please confirm that the final weekday collection time at the mailbox in front of the Ainsworth NE 69210, a city delivery office, meets the requirements of POM Section 322.231. [c] Please provide a listing of the 1-day, 3-day surface, and 3-day air Clearance Times for these 17 outlier offices. [d] Please provide a listing of each of these 17 outlier facilities which lists the following data: [1] Name of each associate post office [2] ZIP Code [3] Whether the office has city delivery [4] The final weekday collection time at the main post office collection box [5] The final Saturday collection time at the main post office collection box [6] Confirmation that the mail which is collected on the various delivery routes operating out of that office will be processed so that Day 0 is the day of collection. [e] Please confirm that mail which is deposited in the collection box in front of the Valentine NE post office prior to 6 PM will be able to be collected and processed in time to meet the 6:30 PM Clearance Time. [f] Please confirm that each of these 17 outlier facilities will be able to meet the Clearance Time for its parent Originating P&DC. [g] Please explain any items that you are unable to confirm.

DBP/USPS-89 Please refer to your response to DBP/USPS-37 and the associated Library Reference USPS LR C2001-3/3. [a] Please confirm that an "Outlier" facility, such as Midland, Texas, will process and dispatch its own overnight mail independently of its Parent P&DC but that it will dispatch its 2-day and 3-day mail to its Parent P&DC

in El Paso, Texas, for forwarding on to the rest of the country. [b] Please confirm that the 2-day and therefore, by default, the 3-day service standards of the "outlier" facility will be uniform within its area but may be different than those of its Parent P&DC - such as - Midland, Texas, will have a different 2- and 3-day delivery standard than El Paso, Texas. [c] Please confirm that the 2-day delivery standard area for Midland, Texas, includes the ADCs in Albuquerque, Tulsa, Oklahoma City, San Antonio, North Texas, Fort Worth, and part of North Houston. [d] Please confirm that the 2-day delivery standard area for El Paso, Texas, includes the ADCs in Albuquerque, San Antonio, and Phoenix. [e] Please confirm that for mail originating in Midland, Texas, that part of the North Houston ADC is 2-days and the remainder is 3-days. [f] Please explain why the entire ADC is not the same service standard. [g] Are there any other instances in the country of this division of an ADC for 2- vs. 3-day delivery standard? [h] If so, please provide the listing of facilities involved and the reasons for not being able to make the entire ADC the same. [i] Please provide a listing of the projected drive times from both Midland and El Paso to the ADCs at Albuquerque, Tulsa, Oklahoma City, San Antonio, North Texas, Fort Worth, North Houston, and Phoenix. [j] Please explain why Midland is able to reach those ADCs in 2-days that its parent P&DC El Paso is not able to reach in 2-days. [k] Please explain why the service standard from the Parent P&DC El Paso to the Outlier facility Midland is three days and two days in the reverse direction [as opposed to overnight service]. [l] Provide a listing of the data for each of the 17 Outlier facilities which lists the following information: [1] Outlier facility [2] Parent P&DC [3] ADCs within the 2-day delivery standard of the Outlier facility [4] Projected drive time to each of these ADCs [5] ADCs within the 2-day delivery standard of the Parent P&DC [6] Projected drive time to each of these ADCs [7] An explanation of any instances where the 2-day delivery standard for the Outlier facility is better than that of its Parent P&DC [8] An explanation of any instances where there is not overnight service between the Parent P&DC and the Outlier facility.

DBP/USPS-90 Please refer to your response to DBP/USPS-55 and the associated Library Reference USPS LR C2001-3/3. [a] Please confirm, or explain if you are unable to do so, that of the 127 exceptions to the use of 12.049 hours drive time as the

dividing time between 2-day and 3-day service standards, 124 or 97.6% represent those instances where a drive time of 8.1 to 12.0 hours has resulted in 3-day delivery rather than 2-day delivery while only 3 or 2.4% represent those instances where a drive time of 12.1 to 12.2 hours has been upgraded to 2-day delivery from 3-day delivery. [b] Please provide an explanation of the reasons and rationale for each of the 127 exceptions and why each of them represents provision of adequate mail service to users in that area.

DBP/USPS-91 Please refer to your response to subpart a of DBP/USPS-51 through 53. The responses to DBP/USPS-52 and 53 refer to DBP/USPS-51. Please explain and discuss any plans that the Postal Service has for dealing with and reducing the "room for improvement". [a] Provide the response for dealing with the "basic level" of "room for improvement" for overnight mail. [b] Provide the response for dealing with the "twice as much level" of "room for improvement" for 2-day delivery mail. [c] Provide the response for dealing with the "2.5 times as much level" of "room for improvement" for 3-day delivery mail.

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.

November 5, 2001

David B. Popkin