

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-38, 43 AND 47)

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin that were filed on October 15, 2001: DBP/USPS-38, 43 and 47.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Ratemaking

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November 13, 2001

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

DPB/USPS-38

Please refer to your response to DBP/USPS–11 subpart c, (a) please confirm, or explain if you are unable to do so, that the Postal Service will include in its contract with organizations that transport the mail between facilities a minimum speed at which the vehicles are to be operated at. (b) Please confirm, or explain if you are unable to do so that, on average, the contracted speed will be over 19% less than the speed limit established for that road. For example, if the authorized speed limit is 55 MPH, the Postal Service will contract for that route to be driven at, on average 44.55 MPH.

RESPONSE:

It cannot be confirmed what the average contracted minimum speed is without an analysis of all contracts. Local conditions are factored in each determination and the contracted minimum speed varies from route to route, with higher speeds in less congested parts of the country. It can be confirmed that minimum contracted minimum speeds are lower than the applicable speed limits.

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

DBP/USPS-43.

Please refer to your response to DBP/USPS-26 subpart I, please provide a response with respect to the conditions that existed at the time of Docket No. N89-1 and the reasons for eliminating the inquiry of public input for service standards.

RESPONSE:

The Postal Service has been unable to locate records which would confirm whether any such quarterly public solicitations were a matter of policy or the extent to which they were a matter of practice at the time of Docket No. N89-1. Accordingly, the Postal Service is unable to say, if such solicitations were a matter of policy or practice, why they may have been discontinued.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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DBP/USPS-47

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 not utilized to advance the delivery time for First-Class Mail by one or two days over that which may be obtained utilizing surface transportation in whole or in part. The information desired are those pairs where there is currently either a 2-Day service standard that could be converted into an overnight service standard by the use of air transportation in place of existing surface transportation or a 3-Day service standard that could be similarly converted into an overnight or 2-Day service standard.

RESPONSE:

Air transportation is utilized to meet applicable 2-day service standards. It is not used to advance the delivery time that otherwise would be obtained if mail with the same service standard were transported by surface. Thus, it is not used because there is no surface transportation available to meet the same service standard. Hypothetically, one could convert a substantial percentage of (if not almost all) 2-day origin-destination pairs to overnight pairs, if one had access to the always hypothetically perfect supply of airplanes and trucks with the always hypothetically perfect schedules and capacity, matched with hypothetically perfect mail processing operations without capacity limitations or labor issues, and putting aside any considerations of cost. Seeking to accomplish such an objective in the real world would be complicated and it is not clear what purpose would be served by seeking to accomplish such an objective. The same would be true of converting existing 3-day service standards to 2-day and overnight service.

## 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 all parties of record in this proceeding.

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