

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Nov 19 5 06 PM '01

Complaint on First-Class Mail
Service Standards

POSTAL RATE COMMISSION
Docket No. C2001-3 THE SECRETARY

MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-71[C] AND
76.

November 19, 2001

On November 5, 2001, the United States Postal Service filed Objections of the United States Postal Service to Interrogatories of David Popkin ["Objections"].

Respectfully submitted,

November 19, 2001

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

DBP/USPS-71[c] This interrogatory is attempting to evaluate the differences between the actual travel time that it takes between point A and point B when traveling by the "most appropriate surface route" as determined by the PC Miler software vs. the time it actually takes when the vehicle utilizes some other routing. The Postal Service has made a big point of utilizing the 12-hour drive time as the difference between 2-Day and 3-Day Service Standards. As such, this is important to evaluate the application of that criteria.

DBP/USPS-76 Interrogatory DBP/USPS-17[a] asked and was responded to as follows:

(a) Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has an overnight delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in two or more day service.

RESPONSE:

(a) Currently, none.

My perception is that the mail between Honolulu and Hilo, Hawaii, which has an overnight delivery standard is transported by air. As such, I am attempting to clarify the answer and ensure that the record will contain the correct information. While most of the focus in this Docket has been related to the 48 contiguous states, Hawaii and Alaska are still in the United States.

For the reasons given, the Postal Service should be compelled to provide the answers to those interrogatories that have been objected to.

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 19, 2001

David B. Popkin