

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-2-8)

The United States Postal Service hereby files its responses to the following
interrogatories of Douglas Carlson: DFC/USPS-2-8, filed on October 25, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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November 19, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS CARLSON

DFC/USPS-2.

Please refer to paragraph 15 of the Declaration of Charles M. Gannon. Please provide all documents that support Mr. Gannon's assertion that "commercial air transportation service" was "more erratic and less reliable than historically had been the case, with a more significant impact on 2-Day mail." This interrogatory specifically includes documents that describe commercial air transportation service for two-day mail between cities in the western states.

RESPONSE:

Mr. Gannon stated that it became apparent to the Postal Service's transportation managers that commercial air transportation service was more erratic and less reliable than historically had been the case. This was the consensus opinion gleaned from *national meetings, telephone conferences, and the visits that Mr. Rapp, Mr. Harris, Mr. Gannon and the Service Standard Review Team made to each Area to discuss the 2 & 3-Day Model and the completion of Phase 2.* See also the response to DBP/USPS-24(e) and USPS LR C2001-3/2. There are no documents specific to western states.

The mere fact that there are 24 fewer hours available to transport, process and deliver 2-Day mail vs. 3-Day mail means that any delay on 2-Day mail will have a more significant impact on the Postal Service's ability to deliver an item within the assigned *Service Standard vs. a corresponding delay to a 3-Day mail item (when both are deposited at the same time).*

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DFC/USPS-3.

Please refer to the response to DBP/USPS-10(b). Please provide a list of all temporary exceptions, and please identify all ZIP Code pairs that were allowed to remain three days and the reasons therefor.

RESPONSE:

The list of the approved temporary exceptions is included as USPS LR C2001-3/4, file DFC-USPS-3.xls. Senior management in some of the Areas requested the temporary exceptions. It was their opinion that the amount of overall increases that their respective Areas would have to absorb as a result of the output of the 2 & 3-Day Model would adversely impact their ability to provide a consistent level of service in the short term. Since more consistent service was one of the primary intended outcomes of the 2 & 3-Day Phase 2 realignment finalization, Headquarters concurred and reach an agreement with each of the requesting Areas as to which pairs would receive temporary relief from the modeled 2-Day status.

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DFC/USPS-4. Please refer to the response to DBP/USPS-10(c).

- (a) Please provide a list of all voluntary upgrade exemptions that were requested, whether granted or not, including the reasons therefor. Please include all documents relating to these requests for voluntary upgrade exemptions.
- (b) Please identify all ZIP Code pairs that were allowed to remain two days and the reasons therefor.

RESPONSE:

- (a) The list of all voluntary upgrade exemptions was provided as USPS LR C2001-3/4, file DFC-USPS-4.xls. There were no Voluntary Upgrade requests that were not approved. All Voluntary Upgrade request transactions were conducted via telephone; accordingly, there are no related documents.
- (b) The wording of the response to DBP/USPS-10(c) suffers from some imprecision. While there were pairs that were modeled for 3-Days that were allowed to voluntarily upgrade to 2-Days, there were not any pairs that were already 2-Days, modeled for 3-Days, that were requested to stay 2-Days. In hindsight, the wording of that portion of the USPS response to DBP/USPS-10 (c) should have read along the lines of :

However, some Voluntary Upgrade Exceptions were granted, based on requests from Senior Management in our Area offices.”

For this reason, there are no pairs that meet the stated criteria.

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DFC/USPS-5.

Please refer to the response to DBP/USPS-11. Please provide a list of the 124 Customer Service Facilities.

RESPONSE:

The list of the 124 Customer Service Facilities in the contiguous 48 (plus, 4 offshore CSFs) was provided in USPS LR C2001-3/1, as file OCA-12B-2.xls.

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DFC/USPS-6.

Please provide copies of all inquiries that the Postal Service has received from Congress in 2000 and 2001 concerning changes in First-Class Mail service standards. Please include the Postal Service's response to each congressional inquiry.

RESPONSE:

The USPS Headquarters Government Relations Department is reviewing its files to determine whether there are any records other than a recent letter from Congressman Burton to the Postal Service (prompted by a letter from the Complainant in this proceeding) and the Postal Service's response. Any such responsive records will be filed in a Library Reference.

RESPONSE OF UNITED STATES POSTAL SERVICE
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DFC/USPS-7.

Please provide copies of all correspondence that the Postal Service has received from customers in 2000 and 2001 concerning changes in First-Class Mail service standards.

RESPONSE:

The Postal Service is searching the files of the office of its Consumer Advocate at Headquarters, as well the files of Mr. Gannon's office. It is assumed that this request is for copies of all correspondence received by persons who or entities that are not intervenors in this proceeding.

It is the policy of the Postal Service not to publicly disclose copies of correspondence if such disclosure could result in an unwarranted invasion of the personal privacy of individuals. Ordinarily, for instance, the Postal Service does not publicly disclose the names and addresses of customers without their consent.

If responsive records are identified, they will be compiled and the proponent of this interrogatory will be contacted for the purpose of initiating discussions regarding *appropriate protective conditions to govern intervenor access to such records.*

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DFC/USPS-8.

Please refer to the response to OCA/USPS-10. Please provide the EXFC on-time score for the three-digit ZIP Code pairs whose service standard was changed in 2000 or 2001 from two days to three days. For these three-digit ZIP Code pairs, please provide the EXFC on-time score for a comparable time period in the two years immediately prior to the implementation of the new service standards.

RESPONSE:

Based on PQ 4 results only, the EXFC scores for the pairs that moved from two days to three days were as follows:

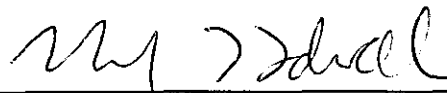
PQ 4, FY-99 = 78.44

PQ 4, FY-00 = 78.59

PQ 4, FY-01 = 88.18

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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