

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Complaint on First-Class Mail
Service Standards

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. C2001-3

DAVID B. POPKIN FOLLOW-UP INTERROGATORIES TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-92-103]

November 21, 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 21, 2001

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

DBP/USPS-92 Please refer to your response to DBP/USPS-47. [a] Please explain the extent to which the improvement in service standards could be accomplished if the existing level of the supply of airplanes and their schedules and capacity was considered. Provide the listing of origin-destination pairs. [b] Please enumerate the differences that exist between the present level of mail processing operations and the claimed hypothetically perfect level in your response. [c] To what extent is the Postal Service attempting to improve the present level of mail processing operations to reach the referred to hypothetically perfect level. [d] Please discuss the reasons for and the extent to which mail processing capacity limitations affect the improvement in service standards by the use of air transportation in place of surface transportation. [e] Please discuss the reasons for and the extent to which mail processing labor issues affect the improvement in service standards by the use of air

transportation in place of surface transportation. [f] Please provide the approximate dollar amount of the cost considerations that would result by the improvement in service standards by the use of air transportation in place of surface transportation.

DBP/USPS-93 Please refer to your response to DBP/USPS-56 subparts b through e. [a] Please confirm, or explain if you are unable to do so, that utilizing a 3-Day Delivery Standard for a particular pair in place of an Overnight or 2-Day Standard will always improve the percentage of mail which arrives within a prescribed number of days. For example, if for mail sent from A to B, 60% is delivered overnight, 30% is delivered on the second day, 8% is delivered on the third day, and 2% takes four or more days to deliver, then if that A to B pair had an overnight Service Standard, it would have a 60% on-time delivery; if it was made a 2-Day Service Standard, it would have a 90% on-time delivery; and if it was made a 3-Day Service Standard, it would have a 98% on-time delivery. [b] Please confirm, or explain if you are unable to do so, that there is an incentive to increase the Service Standard time since it will result in more favorable delivery results.

DBP/USPS-94 Please refer to your response to DBP/USPS-56 subpart e. At the time of Docket N89-1 did the definition of Service Standard with respect to consistency of mail delivery times utilize the concept of "on the scheduled day of delivery" as opposed to "within a prescribed number of days" [or words of similar import]? This interrogatory is asking for a response regardless of whether documents are available for production.

DBP/USPS-95 Please refer to your response to DBP/USPS-56 subpart h. Please advise why the decision has been made to eliminate the mileage figures all together rather than convert them to highway miles.

DBP/USPS-96 Please refer to your response to DBP/USPS-59. Your response in providing an example where only 10% of the mail is delivered within the indicated Service Standard seems to be well out of the norm. Please provide a response which

uses an example that matches a normal occurrence of 85-plus percent arriving within the Service Standard.

DBP/USPS-97 Please refer to your response to DBP/USPS-70. [a] Please confirm, or explain if you are unable to do so, that the first two sentences of your response relate to the choice of 2:30 AM as the Clearance Time and not why the 12-hour clock starts at 2:30 AM irrespective of those plants that might have an earlier CT. [b] Please confirm, or explain if you are unable to do so, that not all P&DC facilities have subordinate CSFs and P&DFs. [c] Please confirm, or explain if you are unable to do so, that the "obligation" of all facilities is to process the mail "as fast as reasonable possible" and that any excess time that is provided will, in effect, slow down the mail [in those instances where slowing it down does result in delivery on a later date]. [d] Please confirm, or explain if you are unable to do so, that any consolidations of mail is already built into the clearance times.

DBP/USPS-98 Please refer to your response to DBP/USPS-71. [a] Please confirm, or explain if you are unable to do so, that the actual travel time utilized in transporting the mail between points A and B will differ from the projected time as determined by the PC Miler software. [b] Please confirm, or explain if you are unable to do so, that the primary function of the use of the PC Miler software is to obtain a precise "drive time" number between any two points to allow for a precise "cut-off" figure to separate 2-Day from 3-Day mail and thereby removing much of the subjective evaluation in reaching the decision.

DBP/USPS-99 Please refer to your response to DBP/USPS-72. [a] Please confirm, or explain if you are unable to do so, that the use of highway transportation between points A and B that have a 2-day Service Standard will have a drive time of 12.049 hours or less while the use of other means of transportation [such as air, rail, ferry, or other means] could result in a "drive" [assume to mean fly, rail, sail, or other similar word] time of greater than 12.049 hours. [b] Please explain why it is satisfactory to have a travel time of greater than 12.049 hours [as might exist with the use of other

forms of transportation] receive a 2-Day Service Standard while for those routes that are transported completely on the highway, the same travel time would result in a 3-Day Service Standard.

DBP/USPS-100 Please refer to your response to DBP/USPS-73 subpart a. [a] Your response did not provide a specific response as to why 12.049 hours could meet the conditions for 2-day delivery while 12.050 hours, or 3.6 seconds longer, would mandate a 3-day standard. Please advise. [b] Please confirm, or explain if you are unable to do so, that the above cut-off criteria of 12.049 vs. 12.050 hours is an arbitrary cut-off point chosen to be that value which will allow for mail for all ADCs to arrive for 2-day delivery. [c] Please confirm, or explain if you are unable to do so, that there are a number of paths where a drive time of greater than 12.049 hours could still result in 2-day delivery but that cutoff was chosen to remove much of the subjective evaluation in reaching the decision.

DBP/USPS-101 Please refer to your response to DBP/USPS-73 subpart b. [a] Please confirm, or explain if you are unable to do so, that any incremental changes in the EXFC performance scores could result from the downgrading of the service standards [thereby allowing more mail to arrive by the service standard] as well as by actual improvements in the mail processing. [b] Please estimate the percentage of EXFC performance score changes that resulted from changes in the service standards vs. actual improvements in the mail processing.

DBP/USPS-102 Please refer to your response to DBP/USPS-80. [a] Please explain why the HASP system is not also utilized for 3-day mail. [b] Please provide a listing of the 12 HASP facilities and the facilities from which they consolidate mail.

DBP/USPS-103 The following interrogatory is asked as a follow-up to the Ruling made in Presiding Officer's Ruling No. C2001-3/3. To the extent that an extension to established deadlines is required to consider this a follow-up interrogatory, a motion for

this reasonable period is requested since I could have filed a follow-up interrogatory rather than a motion to compel to resolve my original concern.

Please provide three separate responses to this interrogatory. The first to indicate the conditions that existed at the time of Docket N89-1; the second to indicate the current Postal Service policy; and the third to explain and discuss any differences between the first two responses. To what extent, if any, arrangements would be made to ensure that in-state mail would be overnight or 2-day service?

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 21, 2001

David B. Popkin