

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

REPLY OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF DAVID POPKIN
TO COMPEL RESPONSES TO INTERROGATORIES
(November 27, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this reply to the November 19, 2001, motion of Mr. Popkin to compel responses to the following interrogatories: DBP/USPS-71(c) and 76.

DBP/USPS-71(c)

This interrogatory asks the Postal Service to provide information that compares the surface transportation drive times for trucks that travel between hundreds of postal facilities projected by the use of PC Miler software with the actual drive times experienced by the thousands of trucks that operate on thousands of postal highway contract routes every day. Mr. Popkin asserts a need for this information in order to evaluate

"the differences between the actual travel time that it takes between point A and point B by the most appropriate surface route as determined by PC Miler software vs. the time that it actually takes when the vehicle utilizes some other routing."

Popkin Motion at 1 (November 19, 2001).

Mr. Popkin wants to examine the entire surface transportation network truck-by-truck, route-by-route. For this purpose, the Postal Service is expected to review all records relating to each truck trip on every route and, for each route,

provide a comparison between the drive times projected by PC Miler software¹ and actual drive times.

The Postal Service collects daily surface transportation data from approximately 480 facilities, almost all of which process or cross-dock First-Class Mail. Some of these facilities have as many as 500 daily truck routes. Many routes have multiple daily trips. It is estimated that it would take several weeks of work hours to manually isolate which trips among these facilities were direct (from origin A to destination B) and which ones went through (or between) Hub and Spoke (HASP) transfer facilities during transit. From that point on, it is estimated that with proper programming, data from each truck run for an Accounting Period could be generated and compiled in two weeks.² The Commission should consider this burden in determining whether to compel the requested information.

As part of the process of finalizing Phase 2 of the realignment plan at issue in this proceeding, the Postal Service had to clarify, for each originating 3-digit ZIP Code area, which 3-digit ZIP Code area destinations would be presumptively 2-day and which would be 3-day. The 2-day definition requires a determination of “reasonable reach” by surface transportation from each origin. In order to determine which destinations are within reasonable reach from a particular point of origin by surface, the Postal Service had to (1) identify a route

¹ Developed for the purpose of determining which destinations would be deemed to be within “reasonable reach” of surface transportation, for purposes of differentiating between 2-day and 3-day destinations, as part of the service standard realignment at issue in this proceeding.

² This estimate assumes that postal transportation personnel are not distracted from this task by any responsibilities associated with transportation rescheduling associated with the aftermath of the events of September 11th.

between each origin and destination and (2) project a drive time.³ For purposes of clarifying the application of the 2-day service standard, the Postal Service determined that 12 hours of drive time would serve as the standard for determining the “reasonable reach” of surface transportation nationwide. As explained in the July 30, 2001, Declaration of Mr. Gannon and in numerous interrogatory responses provided by him or the Postal Service, in developing the service standard changes at issue in this proceeding, the Postal Service used PC Miler mapping software to help identify the most appropriate surface route and to develop estimates of drive times between various points in its network.

Presumably, Mr. Popkin now apparently wants to challenge whether another mapping software could have or should have been used. Maybe he wants to explore whether the routes deemed appropriate for projecting drive times by PC Miler are the most appropriate. Maybe he wants to argue that if alternate routes (other than those suggested by PC Miler) were taken, minutes could be shaved off of projected trip times and some destinations designated as 3-day (over 12 hours) by the Service Standards Team in 2000 and 2001 could have been designated as 2-day (under 12 hours) instead.⁴

The question now before the Commission is whether the resolution of the

³ There can be different routes from point A to point B. Although a particular route may be designated as the most appropriate route for purposes of projecting a drive time between those points, highway contract route drivers are not necessarily restricted to that exact route in pursuit of their obligation to make timely delivery.

⁴ The Postal Service is perfectly willing to stipulate that this may be the case somewhere in its network, and will do so under the condition that Mr. Popkin stipulates that the opposite is true, that there are current 2-day destinations that could be re-designated as 3-day, if alternate, non-PC Miler routes were used in projecting their drive times.

issues raised by the complaint of Mr. Carlson requires the information requested by Mr. Popkin.

Mr. Popkin says he needs to evaluate the reasonableness of the 12-hour standard. The Postal Service submits that the reasonableness of the 12-hour can be judged on the basis of whether it has a rational foundation. Its basis is explained by the July 30, 2001, Gannon Declaration and in numerous interrogatory responses. Mr. Popkin argues that it is important to evaluate the application of the determination to use a 12-hour drive time as a standard for defining “reasonable reach” in distinguishing between 2-day and 3-day service standards. However, the Postal Service’s application of the determination to use a 12-hour drive time standard is reflected in the current service standards between origin-destination pairs that are at the heart of this proceeding. Mr. Popkin has that information. To evaluate the application of the 12-hour drive time standard, Mr. Popkin can point-and-click to his heart’s delight on the First-Class Mail service standards maps contained in DFC-LR-1 and USPS LR C2001-3/4. These maps differentiate the 2-day and 3-day zones for each 3-digit ZIP Code of origin.

The Postal Service developed and applied a definition of “reasonable reach.” The Postal Service has explained how it developed that definition. The Postal Service has explained how it has applied that definition. This case is not going to turn on the degree to which some trucks, using alternate routes, might get to their destinations earlier or later than the drive times that were projected for the purpose of defining “reasonable reach.”⁵ The ability to make such comparisons may be irresistible to the postal hobbyists wanting to imagine how

⁵ That has to be the case, given the vagaries of interstate and intercity traffic.

they would reconfigure the postal surface transportation network. However, the requested comparison are unnecessary and immaterial to the issues raised by the complaint in this proceeding. Moreover, the burden associated with the exercise of producing the requested information greatly outweighs any value that it could bring to a resolution of the issues raised by the complaint in this proceeding.

The Commission must decide. The parties can either spend this case (and an eternity) debating whether a more reasonable projected drive time could have been developed between any of the thousands of points A and B (currently 11.7 hours, using a PC Miler route), as opposed to 12.3 hours (based on one or more alternate routes). The Commission can compel the Postal Service to undertake the extraordinary burden of poring through its surface transportation data files to generate the data requested by Mr. Popkin.⁶ Alternatively, the Commission can focus this proceeding on the issues raised by Mr. Carlson's complaint: (1) were the service standard changes implemented in a manner consistent with § 3661 and; (2) does the First-Class Mail service resulting from the implementation of those service standard changes comply with the policies of the Act, within the meaning of § 3662? The requested data are not necessary for such a determination.

DBP/USPS-76

Two things are undisputed. First, the service standard changes at issue in this proceeding pertained only to 2-day and 3-day First-Class Mail, not overnight mail. Second, the changes only affected mail in the contiguous 48 states.

⁶ This case is not going to turn on whether some trucks could get to their destinations earlier than the projected drive times, or what routes they could take to get there faster.

Gannon Declaration at ¶32. The Postal Service interpreted DBP/USPS-17(a) in that context and responded accordingly.⁷

So, now the Postal Service gets an interrogatory asking about transportation of overnight First-Class Mail between points in Hawaii. The interrogatory, thus, seeks information that is patently irrelevant on two counts. It pertains to overnight service -- which is not at issue; it pertains to mail in Hawaii, despite the fact that the service standard changes were confined to the 48 contiguous states, excluded Hawaii and Alaska.

At page 2 of his motion, Mr. Popkin says that he wants to ensure that the record contains correct information. The Postal Service wants to go him one better and ensure that the record contains correct, but relevant information. Accordingly, the Postal Service will revise its response to DBP/USPS-17(a) as indicated in the footnote below. Accordingly, there is no reason to expand this proceeding to encompass overnight mail in Hawaii.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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⁷ A revised response will be filed shortly to indicate that there are some continent/island transfers of overnight First-Class Mail involving islands in the Great Lakes and off the coast of Massachusetts.

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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