

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

RECEIVED
Nov 28 1 32 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

DAVID B. POPKIN FOLLOW-UP INTERROGATORIES TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-104-114]

November 28, 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 28, 2001

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

DBP/USPS-104 Please refer to your response to DBP/USPS-64. Are there plans to update the data? If so, please advise when it will be accomplished by. If not, please provide and explain the reasons for not updating the data.

DBP/USPS-105 Please refer to your response to DBP/USPS-25 subpart b and DBP/USPS-89 subpart f. In the April 12, 2001 e-mail message, Mr. Gannon states that there will be changes at the start of PQ1-02 relating to the "Origin Outliers". [a] Are there plans to implement these changes and what is the proposed implementation date? [b] Are these proposed changes to bring the outlier facilities into the same 2-Days = 12.049 hours or less policy? If not, please provide full details of the changes. [c] Has an updated e-mail message been sent? If so, please provide a copy.

DBP/USPS-106 Please refer to your response to DBP/USPS-57 subpart a. Please advise the specific page[s] of the 90-page USPS LR C2001-3/5 that provide the specific response to my original interrogatory.

DBP/USPS-107 Please refer to your response to DBP/USPS-57 subpart b. If one assumes that the DMCS mandated requirement for expeditious handling and transportation is utilized for Priority Mail, then this interrogatory attempts to determine to determine how the similarly worded requirement for First-Class Mail Letters and Sealed Parcels and Cards subclasses meet the requirements. That is the subject of this Docket and therefore please provide a full response of all distinctions.

DBP/USPS-108 Please refer to your response to DBP/USPS-83 subpart a. Please explain why a shorter trip requires a longer buffer time as opposed to the longer trip which has a shorter buffer time.

DBP/USPS-109 Please refer to your response to DBP/USPS-83 subpart b. Please define the term "slipseat driver changes."

DBP/USPS-110 Please refer to your response to DBP/USPS-85 subpart o. Since the mail for Columbia SC ADC from both the Miami and South Florida P&DCs is merged at the Miami AMC, please explain how this commingled mail can have two separate delivery standards [2 days from South Florida and 3 days from Miami].

DBP/USPS-111 Please refer to your response to DBP/USPS-85 subpart q. This interrogatory requested the travel times BETWEEN Atlanta and Montgomery and South Florida and Miami. It did not specify a direction. [a] Please advise the times for South Florida to Atlanta and Montgomery. [b] Please confirm, or advise the times if unable to do so, that the times for Miami to Atlanta and Montgomery is the same as the reverse direction data provided.

DBP/USPS-112 Please refer to your response to DBP/USPS-91. Please explain and discuss any plans that the Postal Service had prior to September 11, 2001, for dealing with and reducing the "room for improvement" as noted in each of the three subparts to Interrogatory DBP/USPS-91.

DBP/USPS-113 Please refer to your response to DBP/USPS-77. While you have stated that there are no records that indicate the breakdown by mode of transportation for 2-day vs. 3-day service standard, the Interrogatory requested the best estimate by Mr. Gannon and/or other qualified employee. Please provide this estimate.

DBP/USPS-114 Please refer to your response to DBP/USPS-77. [a] Please provide the reasons for the 40% increase in the use of commercial air service between FY 1999 and the first three quarters of FY 2001. [b] You indicated that some mail travels by more than one mode yet the total for the 3 modes provided for FY 1999 totals 100.0%. Please explain. [c] Since all mail that travels by air transportation also travels for some small part by surface transportation, please advise how that is handled in the data representation.

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 28, 2001

David B. Popkin