

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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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-115-126]

December 3, 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,

December 3, 2001

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

DBP/USPS-115 Please refer to your response to DBP/USPS-87 subpart a. [a] To use your example, would McDonalds allow 3.4% [13 out of 388 - if the 388 is not the correct total number of postmarking facilities, substitute the correct value and recalculate the revised percentage] of their local franchises to make "square" hamburgers rather than round ones? [b] To achieve the inherent corporate advantages of standardization and become a successful organization, when does the Postal Service plan on having these 13 facilities meet the National standard? [c] If there are no plans, please explain why not.

DBP/USPS-116 Please refer to your response to DBP/USPS-87 subparts b and c. Your responses indicate that the time that the Clearance Time [CT] is later than the National CT of 02:30 is just deducted from the available Buffer Time and that the

resulting standards are exactly the same as if they cleared on time. The CT for Orlando, Florida is shown as 5:15 or 2 hours and 45 minutes after the National CT. Buffer Times are either 2 hours and 30 minutes for the longer trips of over 8 and up to 12 hours Drive Time and 3 hours and 30 minutes for shorter trips of up to 8 hours Drive Time. [a] Please confirm, or explain if you are not able to do so, the above understanding. [b] Please explain how you are able to subtract 2 hours and 45 minutes from 2 hours and 30 minutes and still have the full Drive Time available? [c] If the Postal Service is able to reduce the Buffer Times for the 7 non-compliant offices and still achieve the desired delivery standards, please explain why any or all of the other compliant offices are not able to also reduce their Buffer Times by a similar amount and thereby add that time to their 12-hour Drive Time and achieve a greater 2-day delivery zone that could be obtained with a Drive Time of up to 14 hours and 45 minutes? [d] For each of the 7 non-compliant facilities, provide a listing of the ADCs that are in the 2-day delivery standard and the corresponding Drive Times.

DBP/USPS-117 Please refer to your response to DBP/USPS-87 subpart a. [a] With respect to the 13 facilities that are not able to meet the National CT for three-day mail, is the time that they clear past the National CT subtracted from the buffer time in a similar manner to the 2-day standard activity as described in the response to DBP/USPS-87 subpart b? [b] If not, please describe the action taken. [c] If so, then it would appear that some trips are able to utilize a buffer time of five hours less the normal 9-1/2 hours. Please confirm or explain. [d] Please advise those facilities that might be able to upgrade the delivery from 3-days to 2-days by use of a smaller Buffer Time.

DBP/USPS-118 Please refer to your response to DBP/USPS-89 subpart a. Your response indicates that while the Parent Originating P&DC for Midland, Texas, is El Paso, Texas, Midland dispatches 2- and 3-day mail to Dallas, Fort Worth, Lubbock, Abilene, Roswell, and El Paso. [a] What is the definition of a Parent Originating P&DC as it appears in Library Reference 3? [b] What is the significance of designating El Paso as the Parent P&DC for Midland? [c] For each of the other sixteen Outliers,

please provide a listing showing the facilities to which they dispatch 2- and 3-day mail similar to the way the response for subpart a provides the data for Midland.

DBP/USPS-119 Please refer to your response to DBP/USPS-89 subpart f. While I understand that as an Outlier office Midland is "entitled" to keep its service standards, whatever they might be, I am interested how the mail is dispatched to the North Houston ADC from Midland. [a] Please describe in detail how the mail is dispatched [including facilities transited] from Midland to the portion of the North Houston ADC which has a 2-day delivery standard. [b] Please describe in detail how the mail is dispatched [including facilities transited] from Midland to the portion of the North Houston ADC which has a 3-day delivery standard. [c] Please discuss any rationale which may exist as to the reason[s] why the different service standards that exist today were originally set up for Midland so as to divide the North Houston ADC into both 2- and 3-day standards. [d] Is both the 2- and 3-day service standard mail from Midland to the North Houston ADC transported to the same facility within the area covered by the North Houston ADC before being transported to separate facilities under the North Houston ADC area? If not, provide details on the facilities that receive the mail. [e] For the mail dispatched from Midland towards the North Houston ADC area, during what portions of the trip is the mail destined for the 2-day area transported together with the mail destined for the 3-day area? [f] Confirm, or explain if you are unable to do so, that for all non-overnight, non-outlier facilities that dispatch 2- and 3-day mail to the North Houston ADC have either 2- day or 3-day standards to the entire ADC area. [g] Does the mail dispatched from Midland towards the North Houston ADC area merge with the mail dispatched from any other non-overnight, non-outlier mail facility to the North Houston ADC? If so, provide details.

DBP/USPS-120 Please refer to your response to DBP/USPS-89 subparts g and h. [a] Please provide a listing of those instances where the service standards from an outlier facility are divided between 2-days and 3-days within the same ADC. [b] Please discuss any rationale which may exist as to the reason[s] why the different service

standards that exist today were originally set up for each of the outlier facilities provided in subpart a so as to divide the destinating ADC into both 2- and 3-day standards.

DBP/USPS-121 Please refer to your response to DBP/USPS-89. [a] For each of the ADCs [or part of an ADC] that Midland has a 2-day standard as noted in the response to subpart c of DBP/USPS-89, please advise the P&DC that the mail is dispatched through and the Drive Time from that P&DC to the destination ADC. [b] Please advise the Clearance Time for the dispatch of this 2-day mail from Midland. [c] Please provide the travel time required for the trip from Midland to each of the P&DCs referenced in subpart a. [d] Does Midland transport 2-day mail directly to a destinating P&DC as opposed to a destinating ADC? If so, provide details. [e] Please provide all instances in the country where 2-day or 3-day mail is transported by an originating facility [P&DC/P&DF/CSF] directly to a destinating P&DC as opposed to a destinating ADC. Provide a listing as well as a discussion of the reasons.

DBP/USPS-122 Please refer to your response to DBP/USPS-89 subpart i. Please provide the Drive Time to the same listing of ADCs from any other P&DC that Midland dispatches 2- or 3-day mail to.

DBP/USPS-123 Please refer to your response to DBP/USPS-89 subpart l. [a] Please advise the method to be utilized with Library Reference 4 to obtain the ADCs that are associated with the delivery standards as shown. [b] Confirm that all outlier facilities dispatch their overnight mail directly to the facility involved as opposed to sending the mail through their parent P&DC or other facility? If there are any exceptions, please advise the specifics. [c] Please explain why Billings MT P&DC is only able to have 2-day delivery to part of the Seattle WA ADC [835 and 990-994]. Please advise how that mail is dispatched including the facilities that it travels through. [d] Please advise how the mail is dispatched [including the facilities that it travels through] from Kalispell MT to the Boise ID ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Billings MT has a 3-day delivery standard to the same ADC. [e] Please advise how the mail is dispatched

[including the facilities that it travels through] from Kalispell MT to the Ely NV SCF and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Billings MT has a 3-day delivery standard to the same SCF. [f] Please advise how the mail is dispatched [including the facilities that it travels through] from Amarillo TX to the Denver CO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Fort Worth TX has a 3-day delivery standard to the same ADC. [g] Please advise how the mail is dispatched [including the facilities that it travels through] from Worland WY to the Phoenix AZ ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Cheyenne WY has a 3-day delivery standard to the same ADC. [h] Please advise how the mail is dispatched [including the facilities that it travels through] from Worland WY to the Ely NV 893 SCF and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Cheyenne WY has a 3-day delivery standard to the same SCF. [i] Please explain why Worland WY is not able to achieve 2-day delivery to the 821 Yellowstone Park area while it is able to reach the rest of the Billings MT in 2 days. [j] Please advise how the mail is dispatched [including the facilities that it travels through] from Rapid City SD to the Denver CO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Sioux Falls SD has a 3-day delivery standard to the same ADC. [k] Please advise how the mail is dispatched [including the facilities that it travels through] from Missoula MT to the Boise ID ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Billings MT has a 3-day delivery standard to the same ADC. [l] Please advise how the mail is dispatched [including the facilities that it travels through] from Missoula MT to the Ely NV 893 SCF and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Billings MT has a 3-day delivery standard to the same SCF. [m] Please advise how the mail is dispatched [including the facilities that it travels through] from Lubbock TX to the Denver CO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Fort Worth TX has a 3-day delivery standard to the same ADC. [n] Please advise how the mail is dispatched [including the facilities that it travels through] from Durango CO to the Phoenix AZ ADC and explain why that it

is possible to obtain a 2-day delivery standard while mail from the parent P&DC Colorado Springs CO has a 3-day delivery standard to the same ADC. [o] Please advise how the mail is dispatched [including the facilities that it travels through] from Durango CO to the Ely NV SCF 893 and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Colorado Springs CO has a 3-day delivery standard to the same SCF. [p] Please advise how the mail is dispatched [including the facilities that it travels through] from Mobridge SD to the Denver CO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Sioux Falls SD has a 3-day delivery standard to the same ADC. [q] Please explain why Minot ND is not able to achieve 2-day delivery to the 821 Yellowstone Park area while it is able to reach the rest of the Billings MT in 2 days. [r] Please advise how the mail is dispatched [including the facilities that it travels through] from Childress TX to the Denver CO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Fort Worth TX has a 3-day delivery standard to the same ADC. [s] Please explain why Bismarck ND is not able to achieve 2-day delivery to the 821 Yellowstone Park area while it is able to reach the rest of the Billings MT in 2 days. [t] Please advise how the mail is dispatched [including the facilities that it travels through] from Bismarck ND to the Saint Louis MO ADC and explain why that it is possible to obtain a 2-day delivery standard while mail from the parent P&DC Fargo ND has a 3-day delivery standard to the same ADC.

DBP/USPS-124 Please refer to your response to DBP/USPS-24 subpart e and the associated Library Reference 2. [a] Please confirm, or explain if you are not able to do so, that the Library Reference provides data regarding the timeliness of all flights regardless of whether or not they transport mail. [b] Please confirm, or explain if you are not able to do so, that the Library Reference provides data regarding the timeliness of all flights and does not indicate whether mail is being bumped from any given flight. [c] Please confirm, or explain if you are not able to do so, that the Library Reference provides data regarding the timeliness of all flights and does not indicate any delays that may be experienced in loading or unloading the mail and transferring it to the AMF/AMC. [d] Please confirm, or explain if you are not able to do so, that the Library

Reference does not provide any demonstration of the level of reliability of commercial air transportation as it relates to the transportation of mail. [e] Please provide details and specific data over at least the past five years which will demonstrate the level of reliability of commercial air transportation as it relates to the transportation of mail.

DBP/USPS-125 Please refer to your response to DBP/USPS-27 subpart f and the associated Library Reference C2001-3/5. Please provide specific references as to which pages and sections of the 90-page handbook are responsive to the original interrogatory.

DBP/USPS-126 Please refer to the Library Reference C2001-3/8. [a] What is the present status of the conditions at the airport in Atlanta as well as the status of all of the promised corrective action. [b] Based on the conditions that were discovered in Atlanta, please provide information on the action taken to determine whether similar problems exist at other AMF/AMCs in the country. [c] What is the result of any investigations made as a result of actions taken as noted in subpart b above?

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.

December 3, 2001

David B. Popkin