

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

ERRATTA TO COMPELLED RESPONSES
OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-4 AND 52)

The United States Postal Service hereby revises the compelled responses to DBP/USPS-4 and 52 filed yesterday.

On the second page of the response to DBP/USPS-4(c-e), the word "Efficiencies" is substituted for the word "Savings".

In the response to DBP/USPS-52(a), "2-day" should read "overnight".

Revised responses with these corrections are hereby provided and supersede the responses filed yesterday.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

December 4, 2001

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DBP/USPS-4 [a] Please confirm that each P&DC in the country will dispatch mail to each of the other P&DCs in the country. [b] Please confirm that there are intermediate facilities, such as Area Distribution Centers, in the exchange of mail that is referenced in subpart a above. [c] Please discuss the utilization of the intermediate facilities, including whether they are utilized for overnight, 2-Day, and/or 3-Day mail, referenced in subpart b above. [d] Please provide a listing of each of the intermediate facilities referenced in subpart b above. [e] Please provide information which will provide the details of the movement of mail from each P&DC to each of the other P&DCs in the country. [f] Please explain any items above that you are not able to confirm.

RESPONSE:

(a&b) The 2 & 3-Day Service Standard Model at dispute in this proceeding maps

the mail from an Origin P&DC to a Destination ADC, not to every P&DC.

The Parent ADCs then extract the mail for their subordinate SCFs

(P&DCs, P&DFs or CSFs) and then forward the mail to the appropriate facilities.

(c-e) The flow of mail from CSFs and P&DFs through Parent P&DCs for subsequent dispatch to ADCs, which, in turn, dispatch the mail to the final Destination SCF, has been previously documented in the PowerPoint Presentation on record as part of DFC-LR-1, and in response to OCA/USPS-12 [a]. However, there are intermediate facilities through which mail, in some instances, may travel. These intermediate facilities are in the HASP Network, and their function is described below:

As previously described in response to DBP/USPS-80 [a & b], HASP stands for "Hub and Spoke Program". These facilities handle surface mail,

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Response to DBP/USPS-4 (continued):

primarily for 2-day committed mail, but they also handle 3-Day surface mail. The HASP includes a central point ("hub") where mail for a group of offices ("spokes") can be unloaded from a series of incoming trips, massed according to their intended destination, and then sent on to that destination on another trip. Efficiencies are realized because each trip does not have to drive to each individual office or "spoke" to drop off just a portion of its total load capacity. We currently have 12 facilities around the country in the HASP Network, and they work in conjunction with our P&DCs, P&DFs, CSFs, ADCs, AADCs and SCFs, in the manner described in the above definition. Facilities which are designated as only "HUBs" do not perform the "massing" activity described above for a HASP, as that work is done in advance by the Origin dispatching facility, and the role of the HUB is to primarily "cross-dock" the "already-segregated" mail to appropriate destination dispatches. Currently, the HASP Network facilities are located as follows:

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Response to DBP/USPS-4 (continued):

BINGHAMTON HASP
BINGHAMTON NY 13902-9998

BRONX HASP
BRONX NY 10465-9799

BUSSE SURFACE HUB
ELK GROVE VILLAGE IL 60007-9997

CAPITAL METRO HASP
LANDOVER, MD 20785-1611

HARRISBURG HASP
HARRISBURG PA 17107-9997

INDIANAPOLIS HASP
INDIANAPOLIS IN 46241-3737

NEW JERSEY HASP
CATERET NJ 07008-1112

NORTHERN HASP
WESTBOROUGH MA 01581-3349

SOUTHEAST AREA HASP
CLINTON, TN 37716-6762

SOUTHWEST AREA HASP
DALLAS, TX. 75261-0606

SACRAMENTO SURFACE HUB
SACRAMENTO, CA 95815-9998

VAN NUYS SURFACE HUB
VAN NUYS, CA 91409-9998

(f)

N/A

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DBP/USPS-52

The EXFC results for 2001 PQ4 covering May 19, to September 7, 2001 shows that 86.08% of the nation's mail scheduled for 2-Day delivery arrives on time. [a] Does this show reliable and consistent mail service? [b] Please provide your reasons for the response to subpart a. [c] Please explain the reasons why 13.92% of the mail does not arrive on time [provide a relative level of significance of each of the reasons].

RESPONSE:

- (a) Yes, but to a lesser degree than for overnight mail, and suggesting twice as much room for improvement.

- (b) In relation to the overnight score, the Postal Service regards this 2-day score to reflect less reliable and consistent service because it is lower than the overnight on-time percentage delivered within standard during this time frame.

- (c) The Postal Service has not conducted an analysis which would permit it to declare the relative significance of each reason why 13 percent of the test mail pieces were not delivered within standard in 2001 Q4.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

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December 4, 2001