

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-127-134]

December 6, 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 6, 2001

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

DBP/USPS-127 Please refer to your response to DBP/USPS-51 subpart b. Presiding Officer's Ruling No. C2001-3/6 ruled that, "It would be useful if the Service would attempt to provide, for subpart b, some narrative explanation supporting its conclusion that these percentages constitute reliable and consistent service." Your narrative merely states that it represents a "very reliable and consistent service because a very high percentage of mail is delivered within standard." [a] Your response does not appear to comply with the Order of the Commission and only appears to paraphrase your original response. Please provide a narrative explanation as to why the Postal Service believes that 93.96% of the overnight mail arriving on time represents reliable and consistent service. [b] Your revised response added the word "very" prior to "reliable and consistent service" and "high percentage". At what percentage level does the Postal Service believe that there is a transition between very reliable and consistent service and "just plain" reliable and consistent service? [c] Below what percentage

level would the Postal Service believe that the service was no longer reliable and consistent.

DBP/USPS-128 Please refer to your response to DBP/USPS-51 subpart c. Presiding Officer's Ruling No. C2001-3/6 ruled that, "To the extent other reasons are readily discernable, the Service is directed to provide them." [a] Please confirm, or explain if you are unable to do so, that, based on your latest response to subpart c, the only reasons that the Postal Service has discerned for the reasons why 6.04% of the overnight mail is delivered late are those specified in the November 13, 2001 Opposition of the USPS, namely, "five percent of the late mail is late because of carrier missorts or six percent is late because of machine missorts, or seven percent missed standard because of a failure to sweep collection boxes on time", namely, these are the only reasons that are readily discernible and that there is no readily discernible reason for the other 82-percent of the late mail [100% minus 5%, 6%, and 7%]. [b] To the extent that my choice of the specific quarter 2001 PQ4 may not be representative of the current conditions, please advise if there would be a different response if any of the four previous quarters had been chosen, and if so, provide the response.

DBP/USPS-129 Please refer to your response to DBP/USPS-52 subpart b. Presiding Officer's Ruling No. C2001-3/6 ruled that, "It would be useful if the Service would attempt to provide, for subpart b, some narrative explanation supporting its conclusion that these percentages constitute reliable and consistent service." Your narrative merely states that it represents a "less reliable and consistent service because it is lower than the overnight on-time percentage delivered within standard." [a] Your response does not appear to comply with the Order of the Commission and only appears to paraphrase your original response. Please provide a narrative explanation as to why the Postal Service believes that 86.08% of the 2-day mail arriving on time represents reliable and consistent service. [b] Below what percentage level would the Postal Service believe that the service was no longer reliable and consistent.

DBP/USPS-130 Please refer to your response to DBP/USPS-52 subpart c. Presiding Officer's Ruling No. C2001-3/6 ruled that, "To the extent other reasons are readily discernable, the Service is directed to provide them." [a] Please confirm, or explain if you are unable to do so, that, based on your latest response to subpart c, the only reasons that the Postal Service has discerned for the reasons why 13.92% of the 2-day mail is delivered late are those specified in the November 13, 2001 Opposition of the USPS, namely, "five percent of the late mail is late because of carrier missorts or six percent is late because of machine missorts, or seven percent missed standard because of a failure to sweep collection boxes on time", namely, these are the only reasons that are readily discernible and that there is no readily discernible reason for the other 82-percent of the late mail [100% minus 5%, 6%, and 7%]. [b] To the extent that my choice of the specific quarter 2001 PQ4 may not be representative of the current conditions, please advise if there would be a different response if any of the four previous quarters had been chosen, and if so, provide the response.

DBP/USPS-131 Please refer to your response to DBP/USPS-53 subpart b. Presiding Officer's Ruling No. C2001-3/6 ruled that, "It would be useful if the Service would attempt to provide, for subpart b, some narrative explanation supporting its conclusion that these percentages constitute reliable and consistent service." Your narrative merely states that it represents a "slightly less reliable and consistent service because it is slightly lower than the 2-day on-time percentage delivered within standard." [a] Your response does not appear to comply with the Order of the Commission and only appears to paraphrase your original response. Please provide a narrative explanation as to why the Postal Service believes that 83.18% of the 3-day mail arriving on time represents reliable and consistent service. [b] Your revised response added the word "slightly less" prior to "reliable and consistent service". At what percentage level does the Postal Service believe that there is a transition between slightly less reliable and consistent service and "just plain" reliable and consistent service? [c] Below what percentage level would the Postal Service believe that the service was no longer reliable and consistent.

DBP/USPS-132 Please refer to your response to DBP/USPS-53 subpart c. Presiding Officer's Ruling No. C2001-3/6 ruled that, "To the extent other reasons are readily discernable, the Service is directed to provide them." [a] Please confirm, or explain if you are unable to do so, that, based on your latest response to subpart c, the only reasons that the Postal Service has discerned for the reasons why 16.82% of the 3-day mail is delivered late are those specified in the November 13, 2001 Opposition of the USPS, namely, "five percent of the late mail is late because of carrier missorts or six percent is late because of machine missorts, or seven percent missed standard because of a failure to sweep collection boxes on time", namely, these are the only reasons that are readily discernible and that there is no readily discernible reason for the other 82-percent of the late mail [100% minus 5%, 6%, and 7%]. [b] To the extent that my choice of the specific quarter 2001 PQ4 may not be representative of the current conditions, please advise if there would be a different response if any of the four previous quarters had been chosen, and if so, provide the response.

DBP/USPS-133 Please refer to your response to DBP/USPS-93 subpart b. Please confirm, or explain if you are unable to do so, that it is possible for an individual who is either requesting or evaluating a change of service standards which results in a downgrade of service to have an incentive to do so because it will result in more favorable delivery results and thereby allow that individual to either "look better" or to potentially receive a greater compensation.

DBP/USPS-134 Please refer to your response to DBP/USPS 59 and 96. If I make the correction to DBP/USPS-59 as stated in DBP/USPS-96, then I have a mathematical condition that is not possible since it represents more than 100% of the mail. Please respond to the original DBP/USPS-59 interrogatory.

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 6, 2001

David B. Popkin