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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-104 THROUGH 114)

The United States Postal Service hereby files its responses to the following
interrogatories of David Popkin: DBP/USPS-104 through 114, filed November 28, 2001.

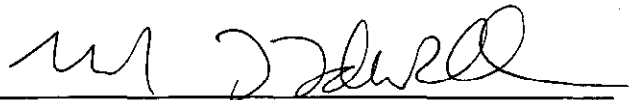
The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



Michael T. Tidwell
Attorney

December 10, 2001

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE:

No. Changes can be handled via a process through which USPS Contracting Officers wanting to schedule faster transportation can request deviations in specific instances.

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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.

RESPONSE:

- (a) Please review the response to DBP/USPS-89(f).
- (b) No. Please review the response to DBP/USPS-89(f).
- (c) Yes. See the attachment to this response.

~ME1179

Author: CHARLES M GANNON at WADC037L
Date: 8/21/01 11:08 AM
Normal
TO: CHARLES M GANNON
Subject: Update on PQ 1-02 FCM Service Standards
----- Message Contents

All Area Managers, Operations Support
All Area Managers, In-Plant Support
All Area Managers, Distribution Networks
All Service Standard Realignment Coordinators

On April 12, 2001, we announced the final major phase of the 2 & 3-Day FCM Service Standard Realignment Model, which became effective on May 19, 2001, the start of PQ 4-01.

At that time, we anticipated that we might make some minor adjustments to some of the resulting standards at the start of PQ 1-02. Primarily, these possible changes were to only involve offices that had been officially designated as "Originating Outliers", and only if such changes seemed appropriate.

Please be advised that the decision has been made that we will not be making any FCM Service Standard changes on September 8, 2001, the start of PQ 1-02, however, the "Outlier" adjustments may still be considered sometime in the future. This decision includes holding in abeyance a final decision on any individual Area requests for any type of changes to existing FCM Service Standards.

Area requests already in the pipeline that are currently pending will still be considered for approval at the start of PQ 2-02, or later.

Gary W. Litwinowicz

*Attachment to
Response to
DBP/USPS - 105*

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE:

The Postal Service considers responsive all portions of the manual that do not refer exclusively to another class of mail.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE:

DBP/USPS-57(b) characterized particular DMCS provisions for First-Class Mail and Priority Mail as being "the same." The instant question characterizes them as being similar, implying that they are not the same. Putting aside whether the questioner regards them as the same or similar, the instant question asks how the "similarly worded requirement for First-Class Mail" . . . "meet the requirements" without providing any indication of what the (latter) requirements may be. Finally, the interrogatory concludes by asking for "a full response of all distinctions." In its present form, DBP/USPS-107 cannot be expected to generate a response.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE:

Because a surface trip up to 8 hours, with a 3.5 hour buffer would be scheduled to arrive at the destination by at least 14:00, 4 hours prior to the National Critical Entry Time of 18:00. A surface trip up to 12 hours, with a 3.5 hour buffer would be scheduled to arrive at the destination by 18:00, exactly at the National CET of 18:00. The Postal Service decided against the hour Buffer Time for trips over 8-hours because:

- (a) Longer trips have a greater likelihood of encountering impediments during the trip.
- (b) The Postal Service wants the longer trips to get on the road from the Origin as soon as possible, due to [a], above, with fewer connections and in-route stops.
- (c) The closer mail arrives to the CET, the greater the chance of mail not clearing processing in time for delivery. The Postal Service wants to leave that small 17:00-18:00 window for its facilities to be able to absorb mail volumes that, while scheduled to arrive earlier, encountered difficulties and arrived later than planned, as invariably happens in a day-to-day real operating environment, either by air or surface transportation.

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DBP/USPS-109

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

RESPONSE:

Slip Seat is defined as "A term used to describe a motor carrier relay operation where one driver is substituted for another who has accumulated the maximum driving time hours." or a "Relay operation where drivers are changed periodically, but the truck continues from point of origin to final destination of the shipment."

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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].

RESPONSE:

As previously described in numerous responses, the standards were based on a 12-hour drive time. As such, South Florida qualified as 2-days and Miami qualified as 3-Days to Columbia. However, the mode of transportation utilized to reach the destination is locally determined, and may even fluctuate from day-to-day, or week-to-week between air and surface. Nevertheless, the transportation mode has no bearing on the actual standards themselves, just on our attempt to meet those standards in a consistent and timely fashion.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE:

(a&b) All drive times used in the 2 & 3-Day Model has been provided in Excel spreadsheet format as part of USPS-LR-1, OCA-12B-1.xls. Any drive times for origin/destination pairs not modeled can be estimated by a variety of means that do not require reliance on the Postal Service.

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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.

RESPONSE:

When service performance and time-in-transit scores are circulated internally, it is expected that managers at all levels of the organization, in the ordinary course of business, will routinely review them and consider whether there is action that they can take to improve deficient scores. Such action need not be part of a special program or plan, but can occur as part of the never-ending adjusting and tweaking of operations at every level of the organization.

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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.

RESPONSE:

As explained earlier, because postal data systems do not distinguish First-Class Mail carried by a particular mode of transportation on the basis of the service standard applicable to individual mail pieces, there is no basis for the Postal Service, institutionally or through one of its knowledgeable employees, to confidently estimate the percentage of First-Class Mail traveling by surface or air that is subject to a 2-day or 3-day service standard.

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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.


RESPONSE:

- (a) The response to DBP/USPS-77 contains a typographical error. The "29.0" figure should read "19.0". An erratum has been filed today.

- (b&c) Inter-modal (air/surface) transport was counted as "air" transport only.

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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December 10, 2001