

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

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON  
(DFC/USPS-12)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson: DFC/USPS-12, filed on November 30, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
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December 13, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-12.** Please refer to the response to DFC/USPS-GAN-17. Please also refer to the document titled "Opposition of the United States Postal Service to Douglas Carlson Motion to Compel Response to DFC/USPS-1" (filed November 14, 2001) at page 11, where the document states, "In Docket No. N89-1, destinations beyond the reasonable reach of surface transportation from a particular origin were deemed to be candidates for a 2-day service standard (based on operational and transportation feasibility and customer needs) if they received more than 0.5 percent of an originating facility's outgoing volume."

- a. Please confirm the truth and accuracy of the statement quoted in this interrogatory.
- b. During and after Docket No. N89-1, please explain the extent to which the Postal Service has used volume as a consideration in determining whether the First-Class Mail service standards between particular ZIP Code pairs would be two days or three days. In your response, please explain whether a high volume tended to increase or decrease the probability that a particular service standard would be two days instead of three days.

**RESPONSE:**

The quoted passage characterizes the cited testimony from Docket No. N89-1. The cited testimony was attested to by the witness.

The Postal Service is unable to locate any supporting documentation from the initial implementation of Docket No. N89-1 which would confirm, or not confirm the degree to which the referenced threshold was ever specifically applied when adjustments were made to the standards in the early 1990s.

The testimony indicated that, at that time, the idea was to consider pairs over the threshold as candidates for a 2-Day standard and to also take into consideration whether timely and dependable air transportation was available.

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**RESPONSE TO DFC/USPS-12 (continued):**

If the volume profiles developed during the FY-00/01 2 & 3-Day Model are any indication, it appears that there were many pairs over the threshold which were not assigned 2-Day standards in the early 1990s during the initial implementation of Phase 2 of the realignment plan. Whether this was because it was determined that there was no dependable air transportation available to support a 2-Day standard, or whether the Postal Service subsequently decided that that threshold was logistically unsupportable, and generally unworkable, is unknown. During the FY-00/01 2 & 3-Day changes at issue in this case, volume was not a determining factor, as the Postal Service modified its operating parameters and significantly expanded its surface capabilities in order to reach substantially more destinations, and delivery points, within 2-Days. The objective in the finalization of Phase 2 was having 2-Day standards which could reasonably be reached in a consistent and timely fashion, without specific regard to paired city volumes. Of course, the general lack of dependable air transportation was a central impetus for the final changes made during FY-00/01.

## 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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