

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-135-139]

December 17, 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 17, 2001

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

DBP/USPS-135 Please refer to your response to DBP/USPS-105 subpart b. The response to DBP/USPS-89 subpart f states that there will some minor "clean-up" changes for the 17 Outlier offices which will have made the Destination ADCs homogeneous. The response to DBP/USPS-105 subpart b states that the changes will not be to make them the same as the non-outlier offices, namely, 12.049 hours or less = 2-day delivery standard. [a] Other than the changes that will be made so that the part of the Destination ADC that requires a change to match the remaining part of the same Destination ADC, confirm, or explain if you are unable to do so, that there will be no changes made which are related to the drive time between the originating Outlier office and the Destination ADC. [b] Confirm, or explain if you are unable to do so, that after the minor "clean-up" changes are made there will still be instances where these facilities will have delivery standards that do not match the nationwide standard of 2-days = 12.049 hours drive time or less. [c] Please provide a listing of those instances where

the delivery standards will not meet the above standard referenced in subpart b and provide the justification for the departure. [d] Please explain why this nationwide standard does not apply to the outlier offices. [e] Please explain how the outlier offices will be able to achieve a faster delivery service than their parent P&DC? [f] Please explain why a faster delivery standard for an outlier facility when compared to its parent P&DC can be considered appropriate.

DBP/USPS-136 Please refer to your response to DBP/USPS-107. Section 252 of the DMCS states, "First-Class Mail receives expeditious handling and transportation, except that when First-Class Mail is attached to or enclosed with mail of another class, the service of that class applies." Section 220 of the DMCS provides a "Description of Subclasses", namely, Section 221 - Letters and Sealed Parcels Subclass; Section 222 - Cards Subclass; and Section 223 - Priority Mail Subclass. [a] Confirm, or explain if you are unable to do so, that the Section 252 of the DMCS applies equally to all three Subclasses noted in DMCS Sections 221, 222, and 223. [b] Confirm, or explain if you are unable to do so, that the expeditious handling and transportation provided for the Letters and Sealed Parcels Subclass and the Cards Subclass is the same. [c] Confirm, or explain if you are unable to do so, that the expeditious handling and transportation provided for the Letters and Sealed Parcels Subclass and the Cards Subclass differs from the expeditious handling and transportation provided for the Priority Mail Subclass. [d] Provide a complete listing of the details of those distinctions that are made where the expeditious handling and transportation provided for the Letters and Sealed Parcels Subclass and the Cards Subclass is less than the expeditious handling and transportation provided for the Priority Mail Subclass. [e] Provide a complete listing of the details of those distinctions that are made where the expeditious handling and transportation provided for the Letters and Sealed Parcels Subclass and the Cards Subclass is greater than the expeditious handling and transportation provided for the Priority Mail Subclass. [f] Since the "Service" described in DMCS Section 252 applies equally to all three Subclasses of First-Class Mail as noted in DMCS Sections 221, 222, and 223, please explain how users of the Letters and Sealed Parcels Subclass and the

Cards Subclass will receive a level of service which equals that provided to the Priority Mail Subclass.

DBP/USPS-137 Please refer to your response to DBP/USPS-110. Your response misinterpreted the interrogatory. The question was not how South Florida arrived at being a 2-day standard and Miami arrived at being a 3-day standard. You have indicated that the mail from both South Florida and Miami and destined to the Columbia SC ADC is merged at the Miami AMC. You have also indicated that the mail is commingled at and flown from the Miami AMC to Columbia SC. For purposes of this interrogatory, assume that we are referring to mail which originates in the South Florida and Miami P&DC areas on a Monday of a no-holiday week and is destined for the Columbia SC ADC. [a] Confirm that the mail from both P&DCs will arrive at the Miami AMC on Monday night and/or Tuesday morning. Provide the normal arriving times for mail from each of the facilities, [b] Is there any external indication on the mail containers as to the scheduled delivery day for the mail. If so, provide details and copies of a sample label. [c] Does the mail from the South Florida P&DC normally fly on the same flights as the mail from the Miami P&DC? If not, provide an estimate of the percentage of time that the mail from both P&DCs will fly together. [d] Describe any efforts, if any, that are made at the Miami AMC to dispatch the South Florida P&DC mail prior to the mail from the Miami P&DC. [e] Confirm that the mail from the South Florida P&DC is scheduled for delivery on Wednesday. [f] Confirm that the mail from the Miami P&DC is scheduled for delivery on Thursday. [g] Confirm that the mail from both the South Florida and Miami P&DCs will arrive at the Columbia AMC/AMF. [h] Describe any efforts, if any, that are made at the Columbia AMC/AMF to dispatch to the Columbia ADC the mail arriving from the South Florida P&DC mail prior to the mail arriving from the Miami P&DC. [i] Confirm that the Columbia ADC is co-located at the Columbia P&DC and is located some distance from the Columbia AMC/AMF such that separate transportation is required. [j] Does the mail that originated at the South Florida P&DC normally travel on the same transportation from the Columbia AMC/AMF to the Columbia ADC as the mail that originated at the Miami P&DC? If not, provide an estimate of the percentage of time that the mail from both P&DCs will be transported

together. [k] Describe any efforts, if any, that are made at the Columbia ADC to process the mail arriving from the South Florida P&DC mail prior to the mail arriving from the Miami P&DC. [l] Is there any internal or external indication on or in the mail containers as to the scheduled delivery day for the mail. If so, provide details as well as copies of a sample label. [m] Please advise the percentage of mail originating at the South Florida P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for. [n] Please advise the percentage of mail originating at the Miami P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for. [o] Please provide a comparison between the percentage of mail originating at the South Florida P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for vs. the percentage for mail that originated at the Miami P&DC in the same time period. [p] How is it possible to explain that mail between the Miami P&DC and the Columbia ADC is receiving expeditious handling and transportation when compared to mail between the South Florida P&DC and the Columbia ADC since both travel together and the mail from the South Florida P&DC has a scheduled delivery date one day earlier? [q] Confirm that it is possible to achieve 2-day delivery standards for mail originating at the Miami P&DC and destined for the Columbia SC ADC as easily as it is to achieve 2-day delivery standards for mail originating at the South Florida P&DC and destined for the Columbia SC ADC. [r] Confirm that even though the mail destined for the Columbia SC ADC from the South Florida and Miami P&DCs will be merged at the Miami AMC and travel together from that point on by air transportation to the Columbia AMC/AMF, the mail from the South Florida P&DC will have a delivery standard of two days because it has a highway drive time of 12.049 hours or less while the mail from the Miami P&DC will have a delivery standard of three days because it has a highway drive time of greater than 12.049 hours. [s] Please explain how the condition described subpart r can be perceived as expeditious handling and transportation. [t] Please discuss and explain any subparts you are unable to confirm.

DBP/USPS-138 Please refer to your response to DBP/USPS-112. Please confirm, or explain if you are not able to do so, that the Postal Service does not have any special program or plan to improve the percentage of mail that is delivered on time and that managers only routinely review the results and consider whether there is any action that they can take to improve deficient scores.

DBP/USPS-139 Please refer to your response to DBP/USPS-112. Please provide details of the various types of action that have been taken as a part of the never-ending adjusting and tweaking of operations at every level of the organization to improve deficient scores.

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 17, 2001

David B. Popkin