

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. C2001-3

Complaint on First-Class Mail  
Service Standards

MOTION TO COMPEL RESPONSE TO INTERROGATORIES DBP/USPS-118-123  
THAT HAVE BEEN OBJECTED TO  
December 21, 2001

On December 14, 2001, the Postal Service filed an Objection to respond to my Interrogatories 118-123 that were filed on December 3, 2001.<sup>1</sup>

Respectfully submitted,

December 21, 2001

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

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The six interrogatories that have been objected to by the Postal Service are attempting to show that the service which is being provided to the mailers in the 17 outlier areas are receiving inconsistent mail service because 2-day and 3-day mail is commingled in the transportation to the destination [For example, mail from outlier facility A and destined to ADC B has both 2-day and 3-day mail to that ADC and yet may travel together to that ADC and will commingle with mail arriving from other P&DCs] or that the service which is being provided to the mailers in the areas served by the parent P&DCs are inconsistent with that provided to the mailers in the outlier facilities served by that parent [For example, mail from outlier facility A and transported to ADC B through its parent P&DC will have 2-day service while the mail from the parent P&DC to the same ADC will have a 3-day service standard].

This inconsistent service is indicative of the service that does not meet the conditions mandated by the Act and DMCS. It is relevant to try and obtain the details of these inconsistencies so that the Commission will be aware of them in reaching their decision.

DBP/USPS-118 subpart c. It appeared that Midland, Texas dispatched mail to other facilities directly and not through its parent P&DC. This interrogatory attempts to

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<sup>1</sup> The Postal Service's Objection states the Interrogatories were filed on November 28, 2001.

determine the extent to which that type of arrangement exists with the other outlier facilities.

DBP/USPS-119 This interrogatory attempts to determine why mail from Midland, Texas to the North Houston ADC can be commingled and yet have 2-day and 3-day service to parts of the same ADC.

DBP/USPS-120 This interrogatory attempts to show the existence of the condition noted in DBP/USPS-119 in other areas of the country.

DBP/USPS-121 and 122 These interrogatories attempt to show the inconsistencies that exist at the outlier facilities and the extent to which they do not meet the conditions of the standards being established for the remainder of the country.

DBP/USPS-123 This interrogatory attempts to show the inconsistencies that exist where an outlier facility appears to receive 2-day service to an area that its parent P&DC has a 3-day standard. If the mail is being dispatched through the parent P&DC, that is inconsistent and should be corrected. For example, why outlier facility Kalispell MT is able to achieve 2-day service to the Boise ID ADC area while its parent P&DC has a 3-day delivery standard to the same ADC.

Furthermore, Rule 26[c] requires that they provide an estimate of cost and work hours required to support a claim of burden, they did not.

For the reasons given, the Postal Service should be compelled to provide the answers to these interrogatories.

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#### 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 21, 2001

David B. Popkin