

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-127 THROUGH 134)

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin: DBP/USPS-127-134, filed December 6, 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

December 21, 2001

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Michael T. Tidwell  
Attorney

## 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 21, 2001

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE DAVID POPKIN

**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.

**RESPONSE:**

- (a) The Postal Service considers its answer to have been responsive. The same answer could have been provided using more words. However, such an answer, if reduced to its essence, would reflect the substance of the answer provided.
  
- (b) The Postal Service's response merely indicated that, relative to the full range of levels of reliability (zero to 100 percent), 93 percent was "very high." Put the right people in a room and one could witness endless quibbling over what constitutes "plain" reliability and how many qualitative levels of reliability there are between "very" and "plain." The Postal Service leaves it to others to participate in those debates.

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**RESPONSE to DBP/USPS-127(continued):**

- (c) At zero percent on time, there would be a complete absence of reliability and consistency. Beginning at 1 percent and continuing to 100 percent, one would observe increasing levels of reliability and consistency.

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**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.

**RESPONSE:**

(a) Not confirmed. As indicated in response to DBP/USPS-51(c), the Postal Service has performed no analysis to determine the specific reasons underlying the failure to achieve on-time performance in FY2001 Q4.

(b) The Postal Service is not sure that it grasps the meaning of this question. Whether or not FY 2001 Q4 is "representative of the current conditions," the response to DBP/USPS-51(c) still stands. The current conditions would be represented by FY2002 Q1 and Q2, which are affected by the aftermath of September 11<sup>th</sup>, anthrax, and the holiday mailing season, hardly making them representative. The four previous (to FY 2001 Q4) quarters would reflect the time period during which service standard changes were still being implemented, making them ill-suited for the requested before-and-after analysis. As indicated in response to DBP/USPS-51(c), no analysis of the "after" quarter (FY 2001 Q4) has been performed.

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**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.

**RESPONSE:**

- (a) The Postal Service considers its answer to have been responsive. The same answer could have been provided using more words. However, such an answer, if reduced to its essence, would reflect the substance of the answer provided. The Postal Service's response merely indicated that, relative to the full range of levels of reliability (zero to 100 percent), 86 percent was reliable, if only to a lesser degree than a higher figure, such as 94 percent. 86 percent reliable is 86 percent reliable. Not as high as 94 percent. Not as low as 80 percent.
- (b) The Postal Service's response merely indicated that, relative to the full range of levels of reliability (zero to 100 percent), 86 percent was still reflective of a degree of reliability and consistency. At zero percent on time, there would be a complete absence of reliability and consistency. Beginning at 1 percent and continuing to 100 percent, one would observe increasing levels of reliability and consistency.

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**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.

**RESPONSE:**

(a) Not confirmed. The Opposition pleading to which this question refers only listed hypothetical reasons that could account for mail being late and assigned hypothetical percentages to each reason to make the point that it was immaterial what the reasons and the percentages were. Nothing in that Opposition could be reasonably construed to suggest that the Postal Service has conducted such an analysis to determine what the reasons are or what their relative percentages may be. The figures in that Opposition -- 5 percent, 6 percent, and 7 percent -- are purely hypothetical. The fact that they add up to 18 percent is purely coincidental.

(b) Please see the response to DBP/USPS-128(b).

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**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.

**RESPONSE:**

- (a) The Postal Service considers its answer to have been responsive. The same answer could have been provided using more words. However, such an answer, if reduced to its essence, would reflect the substance of the answer provided.
- (b) The Postal Service's response merely indicted that, relative to 86 percent, 83 percent was "slightly less" reliable. Again, put the right people in a room and one could witness endless quibbling over whether 83 percent is "slightly less" than 86 percent and whether 83 percent is higher than, lower than, or the equivalent of "plain" reliability. The Postal Service leaves it to others to participate in those debates.



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**RESPONSE to DBP/USPS-131(continued):**

- (c) At zero percent on time, there would be a complete absence of reliability and consistency. Beginning at 1 percent and continuing to 100 percent, one would observe increasing levels of reliability and consistency.

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**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.

**RESPONSE:**

- (a) See the response to DBP/USPS-130(a).
- (b) See the response to DBP/USPS-128(b).

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**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.

**RESPONSE:**

The 2 & 3-Day Service Standard changes at issue in C2001-3 were “systemic” in nature and were generated by the Service Standards Team. Accordingly, they were not requested by individuals motivated by a desire either to “look better” or “receive a greater compensation.” The Service Standards Team had no control over the EXFC system, as it is operated by PriceWaterhouseCoopers. The Service Standards Team had no oversight responsibilities related to EXFC. Those responsibilities rest with the USPS Office of Consumer Advocate. The Service Standard Team had no input into determining whether or the extent to which EXFC scores are related to USPS employee compensation. In any event, the Team UPGRADED more EXFC origin-destination pairs from 3-day to 2-day than they DOWNGRADED from 2-day to 3-day.

Your question asks whether it is possible for a local manager -- despite the following explicit language in the “Policy For Requesting A Service Standard Change” (see USPS LR C2001-3/1, file OCA-1):

A poor service performance trend (either EXFC or ODIS), by itself, is not adequate justification to make changes to service standards. The frequently seen assumption that “moving overnight offices to 2-day standards may result in higher ODIS/EXFC performance scores,” is probably accurate. However, making such a change under the guise of “improving service” or “leveling service,”

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**RESPONSE to DBP/USPS-133(continued):**

without other supporting documentation to operationally justify the change, is considered numerical manipulation and will not result in the approval of the requested change. The Office of Service Management Policies and Programs is not adverse to implementing service standard changes, including downgrades, but they must be supported by adequate documentation showing specific support and justification for necessitating such a change, rather than just providing a record of poor overall service performance between 3-digit offices.

to be motivated by a desire to favorably impact the performance scores by which a percentage of success is measured under non-systemic procedures -- to request "downgraded" standards?

This interrogatory, as posed, is not germane to the 2 & 3-Day Service Standard changes implemented during FY-00/01. The repeated inference in this, and other interrogatories, that Service Standard changes are allowed, or made, for self-serving reasons because those involved are seeking to receive "greater compensation" for themselves is, understandably, offensive to those who toiled to develop and implement the changes at issue in this proceeding. The above quoted language clearly states that such requests will not be approved. This is the policy that Mr. Gannon and his office designed to help maintain the integrity of Service Standards and it is the policy by which they evaluate such requests from Area Offices.

The answer to your question would be the same as the answer to the following question: Is it possible for someone to ask for an affirmative response to a question for which the answer, as a matter of explicit policy and practice, is "Absolutely not!" It is not outside the realm of possibility.

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**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.

**RESPONSE:**

The condition is alleviated, for purposes of the response to DBP/USPS-96, if you assume, as did the Postal Service, that the shift from the DBP/USPS-59 scenario

<u>Overnight</u>	<u>2-Day&amp;Later</u>
10%	90% (60+ 30)

is to

<u>Overnight</u>	<u>2-Day &amp; Later</u>
85%	(any combination adding up to 15%)

The Postal Service has responded to both DBP/USPS-59 and 96, despite the fact, as made clear in the response to DBP/USPS-59, that you are inquiring about a policy for service standard changes of a type not at issue in this proceeding.