

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-135, 136(a-c), 138 AND 139)

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin: DBP/USPS-135, 136(a-c), 138 and 139, filed on December 17, 2001.

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

Responses to DBP/USPS-138(a-l) and (p-t) are forthcoming.

Objections to DBP/USPS-136(d-f) and 138(m-o) were filed on December 26, 2001.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

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 be 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.

RESPONSE:

- (a) That cannot be confirmed because, as previously discussed in the response to DBP/USPS-89(f), that planned action has been postponed for the time being. Headquarters has not yet entered into discussions with the Area offices regarding the potential changes to those offices designated as Originating Outliers. Although it is possible, Outlier offices would not, normally, dispatch mail directly to Destination ADCs (excluding the ADC which has responsibility for the that offices Destinating mail), so there would be no changes based on “drive

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

RESPONSE to DBP/USPS-135 (continued):

times” between them. However, as additional information, a factor which will likely come into play, whenever discussions regarding Outlier “clean-up” take place, will be the drive time from an Outlier to any office through which it will be routing mail in order to make connections to Destinating ADCs. This will be critical because, as remotely located facilities, there may be instances where it is not reasonable to expect an Outlier to have a 2-Day standard to a destination ADC for which it cannot connect to dependable and available transportation which meets the required Critical Entry Time.

- (b) As noted above in response to subpart (a), that can neither be confirmed nor denied, since the activities preceding such changes have been indefinitely postponed. However, it is likely that such a result will be the case, since the very reason they are designated as Outliers is that they cannot make connections to the necessary transportation, due to their remote locations.
- (c) Since the process of determining the changes has been put on hold, the requested list does not yet exist.
- (d) Because they are remotely located facilities, as has been fully explained in several earlier responses, including the response to DBP/USPS-89(I).
- (e) They, most likely, will not.
- (f) Unless, due to a particular geographical layout, it happens to be physically closer to an ADC that cannot be reached in 12 hours by the Parent P&DC, to have

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

RESPONSE to DBP/USPS-135 (continued):

sufficient Originating volume, and to have available and dependable transportation to an ADC, it most likely would not be appropriate, which is exactly the Postal Service originally planned to make adjustments to the Originating Outlier standards this past September, as noted in several earlier interrogatory responses.

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

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.

RESPONSE:

- (a) The section applies to all three subclasses, although it is implemented so that there are different sets of service standards for letters and Cards, on the one hand, and Priority Mail, on the other.
- (b) Confirmed.

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

RESPONSE to DBP/USPS-136 (continued):

(c) See response to subpart (a).

(d-f) Objections filed.

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

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.

RESPONSE:

Postal Service managers at all levels routinely monitor service performance and time-in-transit scores for the purpose of identifying, diagnosing, and correcting problems in mail processing, transportation, and delivery. This is a routine function, in the same sense that hospital emergency room personnel routinely identify, diagnose, and treat a full range of medical situations day-in and day-out. Putting aside the obvious difference in gravity between late mail and most medical trauma, the persons responsible for dealing with these different, but important situations go about their jobs, oblivious to whether someone might argue that what they do is “special” or “routine.”

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

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.

RESPONSE:

Managers whose service areas are the subject of particular ODIS and EXFC scores will routinely examine operations (collection, mail processing, transportation, and delivery) that have an impact on those scores to determine whether there are operational plan failures that can be corrected that might account for deficient scores. Inquiries can be made from Headquarters to Area offices to identify particular mail processing or transportation bottlenecks and to determine when, where, and how solutions can be implemented. The same inquiries can be made from an Area office to local operations within its jurisdiction or to other Area offices. Cross-functional communication (between mail processing and delivery personnel or between transportation and mail processing personnel) can result in corrections to existing mail processing operations or plans, or adjustments to transportation arrangements or changes in transportation modes or schedules to eliminate the source of service failures. Because of the complexity of the postal system, this reviewing, adjusting and tweaking is ongoing.

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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January 2, 2001
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