

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 DOUGLAS CARLSON
(DFC/USPS-61 AND 62)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson: DFC/USPS-61 and 62, filed on March 18, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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October 30, 2002

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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October 30, 2001

Michael T. Tidwell

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS CARLSON

DFC/USPS-GAN-61. Please refer to your response to DFC/USPS-58(d).

- a. Please explain all reasons why First-Class Mail originating at the Reno P&DC and destined to ADC Twin Valley CA is flown from Reno to Los Angeles and does not travel by truck on HCR 980BE trip 406 or another truck route.
- b. Does the truck that transports First-Class Mail from Reno to Los Angeles on HCR 980BE trip 406 stop at any postal facilities between Reno and Los Angeles? If so, please identify them.
- c. In the three months before the service standard for mail originating at the Reno P&DC and destined to ADC Los Angeles CA and ADC Sequoia CA was changed from two days to three days, please identify the method of transportation used to transport this mail from Reno to Los Angeles.

RESPONSE:

- (a) The trip was set up as an extra trip primarily to handle Priority Mail volumes and secondarily to handle First-Class Mail. When the need to retain this trip as a permanent run seemed apparent, the Postal Service, in September 2002, began putting Twin Valley-destined First-Class Mail on the trip.
- (b) The trip stops at Ontario THS, Worldway, and Van Nuys Surface Hub.
- (c) Either by commercial air or postal WNET air.

RESPONSE OF UNITED STATES POSTAL SERVICE
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DFC/USPS-GAN-62. Please refer to your response to DFC/USPS-GAN-58(f).

- a. Please explain the meaning of “direct” truck transportation. For example, do at least four separate trucks depart the San Diego P&DC carrying First-Class Mail, one truck destined to SCF San Francisco CA, another truck destined to SCF Oakland CA, another truck destined to SCF San Jose CA, and another truck destined to SCF Sacramento CA?
- b. Please identify the time at which First-Class Mail originating at the San Diego P&DC and destined to SCF North Bay CA, SCF Eureka CA, SCF Sacramento CA, and SCF Redding CA arrives at the destination processing facility. In your response, please confirm that the transportation to each SCF is by truck.
- c. Please explain the route and method used to transport First-Class Mail from the originating postal facility in Redding, California, to ADC San Diego CA. Please include the arrival time at the San Diego P&DC.

RESPONSE:

- (a) There are four separate trucks carrying First-Class Mail from the San Diego P&DC to San Francisco, Oakland, San Jose and Sacramento.
- (b) Confirmed. Scheduled arrivals times for mail from San Diego to:
 - North Bay (via Van Nuys Hub) 17:45 Day 1
 - Eureka (via SF P&DC) 03:00 Day 2;
 - Sacramento 1500 Day 1;
 - Redding (via Sacramento P&DC) 22:35 Day 1.
- (c) Mail is routed by surface through Sacramento, such that mail departing Redding at 22:25 on Day 0 is scheduled to arrive at San Diego at 1500 on Day 1.