

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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-146]

November 1, 2002

Pursuant to Order No. 1320, I hereby submit a follow-up interrogatory 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,

November 1, 2002

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

DBP/USPS-146 Please refer to your response to DFC/USPS-GAN-62 subpart b. The response indicates that the mail from San Diego to SCF Eureka CA arrives at Eureka after traveling via SF P&DC at 03:00 on Day 2. [a] Confirm that the delivery standard for mail from San Diego to Eureka SCF is two days. [b] Confirm that the 3 AM scheduled arrival time at Eureka is later than the normal Nationwide CET for 2-day mail. [c] Explain why it is possible to utilize a later CET at the Eureka P&DC for mail arriving from San Diego. [d] Please advise the arrival time at the Eureka P&DC of the overnight mail from the Redding CA P&DC. [e] Please advise the arrival time at the Eureka P&DC for 2-day mail arriving from each of the other P&DC that have 2-day service for mail destinating at Eureka [Reno NV and all of the California P&DC facilities other than San Diego - provided in DFC/USPS-GAN-62 - Redding - to be provided in response to subpart d - and Eureka - does not send mail to itself]. If the mail from more than one P&DC arrives in the same truck, so indicate. [f] Please advise the departure time of the

mail from the Eureka P&DC to each of the associate offices under its jurisdiction. These can be combined by the various routes that are utilized. [g] Please advise the arrival time of the mail at the Crescent City and Smith River CA post offices. [h] Please advise the name and arrival time of the associated office of the Eureka SCF that has the latest arrival time for mail from the P&DC to allow for the delivery of mail on that date. [i] To what extent does the Eureka P&DC prepare mail for Crescent City, Smith River, and the other associated offices. For example, approximately what percentage of the mail is sorted by carrier route and what percentage of the mail is sorted in carrier walk sequence [DPS]? [j] To what extent does the Redding P&DC and the other P&DC's that have 2-day mail to Eureka prepare mail that is sent to Eureka? For example, approximately what percentage of the mail is sorted by associated office, carrier route, and carrier walk sequence [DPS]? [k] The response indicates that the scheduled arrival time is 3 AM. What is the normal range of actual arrival times? [l] Please explain any items that you were not able to confirm.

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 and the order authorizing Electronic Service for this Docket.

November 1, 2002

David B. Popkin