

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

DAVID B POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY  
DBP/USPS-146 SUBPARTS f THROUGH k THAT HAS BEEN OBJECTED TO BY THE  
UNITED STATES POSTAL SERVICE  
November 12, 2002

On November 8, 2002, the Postal Service filed an Objection to respond to my Interrogatory.

Respectfully submitted,

November 12, 2002

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

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Interrogatory DBP/USPS-146 attempts to evaluate the ability to achieve 2-day delivery on mail from the San Diego, CA area to offices that are served by the facility at Eureka CA. As noted in the response to Interrogatory DFC/USPS-GAN-62 subpart b, the arrival time at the Eureka facility is 3 AM on the day of delivery. This 3 AM arrival time is considerably later than other facilities that also provide 2-day service from San Diego - for example, the arrival time at Eureka is some 12 hours later than Sacramento.

Subparts f, g, and h are attempting to look at the other half of the operation at the Eureka facility, namely the time that the mail is dispatched from Eureka and arrives at the actual delivery offices. If it is relevant to know that the San Diego mail arrives at the Eureka facility at 3 AM on the date of delivery, it is also relevant to know the ability of this facility to process the mail and dispatch it in time to reach the associated offices in time for delivery that day. Crescent City CA is a city delivery office and Smith River CA is located even further away.

Subpart f asks for the dispatch times from Eureka. Subpart g asks for the arrival time at the associate offices that appear to be located at the greatest distance from Eureka. Subpart h asks for the office that actually does receive the latest mail arrival.

Subparts i and j are designed to evaluate the extent to which it is necessary to process the mail both at the Eureka facility and the extent to which additional processing is required at the various associated offices. An estimate by the Manager of the Eureka facility would satisfy this request.

Subpart k asks for an evaluation of the variation of the 3 AM arrival time. Since there is considerable travel between San Diego and Eureka, this variation may be significant. An estimate by the Manager of the Eureka facility would also satisfy this request.

The Postal Service makes a generalized statement that it would be burdensome to provide this information but does not enumerate the level of the burden as mandated by the Commission's Rules. The data requested by subparts f, g, and h should appear on the transportation records for Eureka and therefore should be readily available. I am willing to accept an estimate for the data requested by subparts i, j, and k.

For the reasons given, the Postal Service should be compelled to provide the answer to this interrogatory.

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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.

November 12, 2002

David B. Popkin