

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

STATUS REPORT OF THE UNITED STATES POSTAL SERVICE
(February 5, 2003)

In accordance with Presiding Officer's Ruling No. C2001-3/34 (January 17, 2003), the United States Postal Service hereby files this status report regarding outstanding discovery in this case.

Carlson Discovery

The Postal Service has reviewed the list of outstanding interrogatories for which responses to Mr. Carlson are owed and has renewed its efforts to compile responsive information. Except for one interrogatory discussed in detail below, it is expected that responses will be provided no later than February 19, 2003. The one exception is DFC/USPS-7. This interrogatory requested copies of all correspondence received by postal customers concerning changes in First-Class Mail service standards. In an informal response to the interrogatory relatively soon after it was filed, the Postal Service indicated to Mr. Carlson that it maintained a data system which indicated that over 11,000 pieces of correspondence were directed to the USPS Headquarters Office of Consumer Affairs in FY2000 and FY2001 from postal patrons in which concerns were raised about mailing services. The Postal Service further informed him that the contents of the correspondence were coded by mail class or service and into six general categories, based on subject matter, for the purpose of tallying which general

subjects arose most frequently.¹

Based upon these codes, Mr. Carlson was informed that 26 pieces of correspondence in FY2000 were categorized as pertaining to “Time/Service Objectives” of First-Class Mail. The corresponding figure for FY2001 was 81. Typically, this correspondence addresses a customer’s experience with late delivery of First-Class Mail. When the Office of Consumer Affairs requires assistance responding to customer inquiries, it generally engages subject matter experts from various other components of postal management for their insight. Headquarters personnel with expertise regarding the service standard changes do not recall any such correspondence being referred to them from Consumer Affairs during this period. This suggests that the overwhelming bulk of such “Time/Service Objectives” correspondence dealt with matters unrelated to the service standard changes at issue in this proceeding. Nevertheless, it is not outside the realm of possibility that this correspondence could include one or more expressions of concern about the service standard changes.

Mr. Carlson was informed that, to determine whether any of these 107 pieces of correspondence raised any concerns about the service standard changes, one would need to physically retrieve all 11,000 pieces from an remote archive and read them all. The Postal Service informed Mr. Carlson of this burden at the time and proposed that he reconsider his request for the information. Most recently, in response to Presiding Officer’s Ruling No. C2001-3/34, the Postal Service revived these concerns, but to no avail.

Clearly, some unknown number (between 0 and 107) of pieces of correspondence in FY 2000 and FY 2001 may have expressed concern about the service standard changes. The Postal Service considers the precise number to be

¹ However, the correspondence is not filed or retrievable by mail class or subject matter.

immaterial to the issues raised by the complaint in this proceeding. Mr. Carlson apparently disagrees. The Postal Service considers that the tremendous number of workhours that would be involved in reviewing 11,000 pieces of correspondence to isolate these 107² -- for the purpose of deducing how many address the service standard changes -- greatly outweighs any value that number could add to these proceedings. Accordingly, the Postal Service is prepared to stipulate that the number of pieces of correspondence that raised the issue is somewhere between 0 and 107. The Postal considers that the parties should, at the appropriate point in these proceedings, assert that the number falls within that range in whatever testimony or other pleadings they may choose to file.

If parties do not agree with this proposal in comments due to be filed on February 12, 2003, the Postal Service will, on the following day, formally file a motion proposing that the Commission adopt such a stipulation for purposes of this proceeding.

Popkin Discovery

The Postal Service has reviewed the list of outstanding interrogatories for which responses to Mr. Popkin are owed and has renewed its efforts to compile responsive information. Except for two interrogatories discussed in detail below, it is expected that responses will be provided no later than February 26, 2003.

A response to DBP/USPS-47 would require construction of a matrix of (1) all 3-digit ZIP Code pairs with a 3-day service standard between which air transportation could, hypothetically, be provided to First-Class Mail to result in 2-day service and (2) all 3-digit ZIP Code pairs with 2-day service standard that, hypothetically, could be

² Even assuming one could skim each piece of correspondence and make a determination in as little as 30 seconds per piece, it would still require approximately 90 workhours to determine which, if any, of the 107 pieces of First-Class Mail “Time/Service Standards” correspondence raised a concern about the service standard changes at issue in this proceeding.

converted to overnight service by use of air transportation. The Postal Service has never compiled a matrix of 3-digit ZIP Code pairs by transportation mode by service standard. Such a project is under active consideration for purposes unrelated to this proceeding, but no timetable has been set for its initiation or completion. In response to this interrogatory, internal discussions at various times have focused on alternative approaches to providing a reasonable, but less than complete response to this interrogatory, accompanied by as clear an explanation as possible as to why it is unreasonable to expect any such matrices to be produced in the foreseeable future. It is anticipated that the ultimate response to this interrogatory will take that form.

DBP/USPS-23 requested copies of all First-Class Mail service standards in effect since approximately 1990. Earlier searches of files have turned up few records. This is not surprising. Each quarter, a new CD-ROM is created to replace the one issued the previous quarter. Users routinely discard the earlier quarter's CD-ROM, and replace its previously downloaded contents on their computer hard drives with the contents of the new CD-ROM. Accordingly, notwithstanding the numbers of CD-ROMS that are produced and distributed internally each quarter, there is no systematic way of retrieving old copies. Moreover, revisions are written into the Service Standards database as they are implemented. Accordingly, there is no master data base of superseded service commitments from a chronological history of service standard changes can be ascertained. One last sweep will be conducted to shake free any older CD-ROM's requested. The results are not expected to be promising.

Finally, concurrent with the compilation and filing of the information described above, the Postal Service also will be reviewing previously filed responses to determine whether any material changes in fact warrant the revision of any such responses. As necessary, revised responses will be filed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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:

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