

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-GAN-63-66)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson: DFC/USPS-GAN-63-66, filed on November 4, 2002.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

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Michael T. Tidwell  
Attorney

**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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RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-GAN-63.** Please refer to your response to DFC/USPS-GAN-61(b). Please explain what the letters "THS" stand for.

**RESPONSE:**

The letters stand for "Terminal Handling Services." The Postal Service has contracts for THS at 59 airports throughout the United States. THS includes unloading/loading of mail, sorting of mail, building and breaking of air containers, drayage of mail, and maintenance/repair of transport equipment.

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**DFC/USPS-GAN-64.** Please refer to your response to DFC/USPS-62. Please explain how First-Class Mail is transported to the San Diego P&DC from the following origin P&DC's:

- (i) Oakland P&DC
- (ii) San Francisco P&DC
- (iii) San Jose P&DC
- (iv) North Bay P&DC
- (v) Salinas P&DF

In your response, please specify which of the originating facilities have direct (separate) trucks to the San Diego P&DC, and please specify the arrival time of each truck at the San Diego P&DC.

**RESPONSE:**

Listed below is the requested Dispatch of Value information:

<b>Origin Facility</b>	<b>Transportation Mode to San Diego CA P&amp;DC</b>	<b>Arrival Time @ San Diego CA P&amp;DC</b>
Oakland P&DC	Direct Truck	16:00
San Francisco P&DC	Direct Truck	17:30
San Jose P&DC	Direct Truck	18:30
North Bay P&DC	Transfer through San Francisco P&DC	17:30
Salinas P&DF	Transfer through San Jose P&DC	18:30

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**DFC/USPS-GAN-65.** Please refer to your response to DFC/USPS-GAN-62. Please provide the arrival times of the trucks that transport First-Class Mail from the San Diego P&DC to the Oakland P&DC, the San Francisco P&DC, and the San Jose P&DC.

**RESPONSE:**

Listed below is the requested Dispatch of Value information:

<b>Origin Facility</b>	<b>Destinating Facility</b>	<b>Scheduled Arrival Time</b>
San Diego CA P&DC	Oakland P&DC	16:00
San Diego CA P&DC	San Francisco P&DC	17:30
San Diego CA P&DC	San Jose P&DC	15:30

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**DFC/USPS-GAN-66.** Please refer to your response to DFC/USPS-GAN-62(b), which indicates that First-Class Mail from the San Diego P&DC to the North Bay P&DC is transported directly to the North Bay P&DC, bypassing the ADC that serves the North Bay P&DC. Please explain how you would determine whether the arrival of mail from the San Diego P&DC to the North Bay P&DC at 17:45 is consistent with the national model, which provides for a CET at the *destination ADC* not later than 18:00.

**RESPONSE:**

In a prior interrogatory, DFC/USPS-GAN-58(g), you asked the following question:

Please discuss the extent to which the San Diego P&DC likely labels First-Class Mail destined to SCF's in ADC Sierra CA and ADC Peninsula CA to the SCF level, not the ADC level. For example, would mail destined to SCF Sacramento CA be labeled to SCF Sacramento CA, not ADC Sierra CA? Similarly, would mail destined to SCF North Bay CA be labeled to SCF North Bay CA, not ADC Peninsula CA?"

The response was as follows:

At a minimum, Pacific Area Plants sort Originating First-Class mails to the SCF level for all Pacific Area SCF destinations. Consequently, the labeling of Intra-Pacific Area First-Class Mail is to the SCF level, not the ADC level.

As previously explained, all Pacific Area Plants sort Originating First-Class mails to the SCF level for all Pacific Area SCF destinations. This means that it is the intention for Intra-Area Plants, such as the San Diego-to-North Bay pair you are inquiring about, to provide a deeper depth of sort in order to bypass the ADC level. Such deeper depths of Originating sortation (below the ADC level) are fairly common (and are locally determined) when adequate volumes of a particular destination are available at a specific origin.

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**RESPONSE to DFC/USPS-GAN-66 (continued):**

These Originating Plants are preparing the mail to go deeper into our sortation system, below the ADC level. Therefore, although 17:45 is *still* prior to 18:00, the National Destination ADC CET of 18:00 does not apply because they have intentionally bypassed the ADC level, and are at what we refer to as the “SCF” level.