

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
(April 11, 2003)

The United States Postal Service hereby files this supplemental response to the following interrogatory of David Popkin: DBP/USPS-17(b).

In the Presiding Officer's Ruling No. C2001-3/35 (April 2, 2003), the matter of DBP/USPS-47 was addressed. This Ruling was a follow-up to the Status Report of the United States Postal Service Regarding Outstanding Discovery (February 25, 2003). In that Status Report, the Postal Service *erroneously* referred to DBP/USPS-47,¹ instead of DBP/USPS-17(b), for which it had previously committed to attempt to provide a supplemental response. The Postal Service apologizes for confusing the issue with its incorrect citation.

However, since the Postal Service intended to cite DBP/USPS-17(b) in that Status Report, its supplemental response to that interrogatory is provided here.

This supplemental response builds upon the original answer to subpart (b), but does not affect subpart (a). The original response to subpart (a) is repeated verbatim and is followed by the new response to subpart (b). The complete interrogatory is stated verbatim

¹ Addressed in Presiding Officer's Ruling No. C2001-3/6 at 11 (November 29, 2001).

and is followed by the original response to subpart (a) and the supplemental response to subpart(b).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 11, 2003

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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SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

REVISED: APRIL 11, 2003

DBP/USPS-17

- (a) Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has an overnight delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in two or more day service.
- (b) Please advise those Origin-Destination ZIP Code pairs where air transportation is utilized to transport mail which has a 2-Day delivery service. For each of these pairs, indicate whether or not the use of surface transportation would have resulted in three or more day service.

RESPONSE:

- (a) Air transportation is utilized to transport overnight First-Class Mail between the mainland and islands in the Great Lakes and off the coast of Massachusetts. Surface transportation between the islands and the mainland exists, although the degree of frequency and availability is seasonal in nature and affected by adverse weather more than air transportation.
- (b) The USPS has diligently attempted to develop an appropriate supplemental response to this question. In our initial response to DBP/USPS-17b we replied:

Every First-Class Mail 2-day service standard is established with the expectation that surface transportation can be used to effect 2-day delivery. Air transportation is used instead for specific 2-day origin-destination pairs when it is more economical to do so and where adequate air service is available. A list of 3-digit origin-destination ZIP Code pairs between which air transportation is being provided is being generated and will be filed in USPS Library Reference C2001-3/9. All Zip Code pair destinations for which air transportation is utilized meet the same criteria as other 2- day pairs in that the destinations are within reasonable reach of surface transportation. Therefore, the use of surface transportation would not be expected to result in another day or more added to delivery times.

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

REVISED: APRIL 11, 2003

SUPPLEMENTAL RESPONSE to DBP/USPS-17 continued

Unfortunately, despite our efforts, we have been unable to produce any viable data in follow-up to our initial comment that we would attempt to provide a list of 2-day First-Class Mail pairs that may be traveling by air transportation.

While we do track volumes by weight between airstop points, we do not currently have the ability in our data systems to distinguish whether or not the mail in question being flown is 2-day or 3-day mail, nor can we currently identify the specific postal facility which generated the volume emanating from a particular airstop. In addition to this, air and surface routings are frequently changed based on fluctuating operational situations and the ever changing availability of air transportation which is responsive to our operational requirements.

Here is an example in order to illustrate the difficulty we encountered in trying to develop the matrix:

The following 6 Parent P&DCs -- Washington DC, Dulles VA, Southern MD, Suburban MD, Baltimore MD, Northern VA - all, on occasion, route mail through the following 3 airports -- Reagan National (DCA), Dulles (IAD) and Baltimore International (BWI).

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

REVISED: APRIL 11, 2003

SUPPLEMENTAL RESPONSE to DBP/USPS-17 continued

Southern MD, Suburban MD and Baltimore MD all have a 2-Day Service Standard to ADC Portland ME 040, while Washington DC, Dulles VA and Northern VA have a 3-Day standard to Portland.

If Reagan National shows, for instance, 500 pounds a day flying to Portland ME, our current system cannot isolate in which of the 6 major facilities the mail in question originated (or even whether it actually originated from another nearby facility such as Richmond VA). It cannot distinguish whether the mail in question was "scheduled" to travel that route, or was diverted to air on just that day due to operational failures, or was routed that way due to cancelled surface transportation. It cannot tell us whether the origin of the mail was, perhaps, outside the DCA area (and it was being rerouted through DCA due to weather or other circumstances) or even whether the mail in question has a 2-Day or 3-Day standard.

Networks Operations Management at Postal Headquarters is in the early stages of developing a system which will eventually identify the elements sought in this interrogatory. Currently, there is no projected activation date for such a system enhancement. At a recent open Board of Governors meeting, postal management received approval to move ahead with the implementation of the planned Surface Air Support System (SASS). SASS is a system which will collect data from our Surface Air Management System (SAMS) and our FedEx routings. It will also contain scanned data from our terminal handling scanners.

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

REVISED: APRIL 11, 2003

SUPPLEMENTAL RESPONSE to DBP/USPS-17 continued

It is the amalgamation of these databases which we eventually expect to allow us to be able to isolate the kind of dataset sought by DBP/USPS-17b.

Since our initial response to DBP/USPS-17b, we have made several attempts, without success, to find a way to “extract” this data from our existing national systems.

Unfortunately, we find ourselves in a position to be unable to provide data that are responsive to this portion of the interrogatory.

Despite our inability to generate and provide the requested matrix, the original thrust of the question posed by Mr. Popkin was already fully responded to in our initial reply. Mr. Popkin wanted to know whether or not the use of surface vs. air transportation was a determining factor in whether or not the Service Standard ultimately assigned to the pair was 2-Day or 3-Day. As indicated in our earlier response, the answer to that question is an unequivocal “no”... the mode of transportation we *actually* use on a daily basis had no bearing on the assignment of the Service Standard. As explained in many of our other responses throughout this proceeding, and in our initial response to DBP/USPS-17b, a 2-Day standard was modeled solely on a 12-hour Drive Time formula from the Parent P&DC to the Destinating ADC. If a pair fell within the 12 hours, it was considered reachable by

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

REVISED; APRIL 11, 2003

SUPPLEMENTAL RESPONSE to DBP/USPS-17 continued

surface transportation, and assigned a 2-Day standard by the Model. Therefore, even if a pair was “actually” traveling by air for operational/logistical reasons (such as inadequate volume between the pair to cost-justify a regular surface route) the use of surface transportation would not be expected to result in another day or more added to delivery times.