

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

**Complaint on First-Class Mail
Service Standards**

Docket No. C2001-3

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID POPKIN**

The United States Postal Service hereby provides responses to the following interrogatories of David Popkin: DBP/USPS-23, DBP/USPS-39, DBP/USPS-60, and DBP/USPS-86(d). The responses to DBP/USPS-23 and DBP/USPS-86 filed today supersede the original responses filed, respectively, on October 4, 2001, and November 26, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in accordance with section 12 of the *Rules of Practice of the Postal Rate Commission*.

Michael T. Tidwell

May 2, 2003

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REVISED May 2, 2003

DBP/USPS-23 Please furnish a copy of the service standards that existed at the time of Docket N89-1 as well as copies of all versions that have been released since that time. Please provide an explanation of the types and extent of changes that occurred between each of the versions provided.

RESPONSE:

The service standard directory is overwritten every postal quarter. CD-ROM copies of earlier quarter versions are not routinely archived. It is impossible to reconstruct all of the changes that have been made among the over 800,000 3-digit ZIP Code origin-destination pairs since the time of Docket No. N89-1. There are no computerized records of the service standards for all ZIP Code pairs in existence at that time. The current proceeding is about changes that took place in FY2000 and FY2001, which are apparent by examination of DFC-LR-1.

After an exhaustive search, the following isolated copies of diskettes and CD-ROMS for the postal fiscal quarters listed below were compiled from various personnel at Headquarters and in the field and have been mailed to the interrogator for examination. In many cases, they are the only copies that could be located. After his examination and the return of these copies, they will be made available to other parties to examine upon request. Routine, minor changes that have occurred between quarters since the initiation of this litigation have been addressed in earlier discovery responses. During 2000 and 2001, there were no changes other than those which prompted the initiation of this litigation. The Postal Service has been unable to locate records pertaining to the minor changes that were implemented before 2000 that are irrelevant to this proceeding.

FY 97 Q1, Q4; FY98 Q1, Q3, Q4; FY99 Q4; FY2000 Q1-Q4

FY01 Q1-Q4; FY02 Q1, Q2, Q4; FY03 Q1-Q3

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DBP/USPS-39 Please provide copies of those records that are available over the past two-year period which show the actual time utilized for various trips by the organizations that transport mail between facilities [at or above the P&DC level] as compared to the calculated value. I would like to be able to compare the reliability of the computer program in determining the travel time between two facilities.

RESPONSE:

PC*MILER® is a tool used in projecting mileage and drive times throughout the shipping and transportation Industry. It is used by over 20,000 motor carriers, shippers and logistics companies. In addition, more than 40 IFTA/IRP (International Fuel Tax Agreement and International Registration Plan) jurisdictions are using PC*MILER as an auditing tool. PC*MILER is also used by more than 750 FMCSA (Federal Motor Carrier Safety Administration) federal and state safety investigators to verify motor carriers' compliance with safety regulations. Here are some of the PC*MILER database statistics:

- 340,000 accessible locations
- 734,500 North American road miles
- Over 4,000 updated Truck Stops from Comdata's GeoFUEL truck stop network

- Updated five-digit U.S. ZIP Codes

- 630 CAT Weigh Scale Stations

- County name designation for every US location

- U.S. Department of Defense (DoD) and General Services Administration (GSA) Compliance

- Most recent North American road openings, name changes and construction updates

- Enhanced major metro area ZIP Code designation

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RESPONSE TO DBP/USPS-39 continued

PC*Miler is a highly regarded product that is used in both the private sector and by other government Agencies. As previously stated in other responses, PC Miler also has the capability of customization. This allowed the Postal Service to take into account postal contracting speed limitations and produce a final product that was tailored for our needs. The Postal Service has not encountered any major difficulties with the data produced by PC Miler and regards it to have been a valuable tool in modeling the drive times for 2 & 3-day destinations. We did not locate any empirical data which define the accuracy of PC Miler versus competing products with *specific* regard to “travel time.” As a further indication of the widespread use of PC*MILER, below is a sampling of information from Web URL locations and press releases issued by other users of the product. These links suggest that the product is widely-used throughout the shipping industry, including those who handle time-sensitive shipments:

<http://www.thechoice.com/dispatch.htm>

<http://www.pcmiler.com/news/pressrel/dodpr1.html>

<http://www.fedex.com/us/about/customcritical/pressreleases/pressrelease050500.html?link=4>

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DBP/USPS-60 Please refer to paragraph b on page 4 of the Policy for requesting a Service Standard Change and provide a copy of the most current “Customer Needs” information that is available in Product Management or Consumer Affairs.

RESPONSE:

There is no specific “Customer Needs” database, *per se*. Personnel in Product Management at Headquarters have contact with a variety of customers and develop expertise in generally assessing what various customers’ expectations may be. The same is true of personnel in the various district Consumer Affairs offices and at Headquarters. These employees are capable of combining their general postal knowledge with information developed through internal cross-functional interaction, along with customer requests, suggestions, complaints, and other communications received by the Postal Service, to develop conclusions about “Customer Needs.” While some of this information is only anecdotal and not necessarily representative of all customers, it is still useful to the Postal Service.

Typically, when a routine service standard change – of the sort not at issue in this proceeding -- is requested internally (e.g., a proposal by a postal district manager to change the service standards between Point A and Points B, C and D), the request is expected to be based upon an assessment of “Customer Needs” – a reflection the perceived impact on customers in the affected geographical areas or postal districts. In these cases, the proponent of the service standard change is expected to have consulted with internal or other sources of information regarding customer needs in the affected area(s) and to offer a summary in conjunction with the request. There is no indication that Postal Service developed either a national or a specific point-to-point assessment of “Customer Needs” as part of the process of determining the 2000-01 service standard changes at issue in this proceeding.

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REVISED: May 2, 2003

DBP/USPS-86 Please refer to your response to DBP/USPS-46.

- (a) Please confirm that in those instances where air transportation is used for 2-day mail, had surface transportation been utilized in place of air transportation, it would still have been possible to meet the applicable 2-day service standard.
- (b) Please explain why air transportation is utilized instead of surface transportation in those instances.
- (c) If you are unable to confirm subpart a, please reanswer my original interrogatory DBP/USPS-46 as asked as well as explain and discuss.
- (d) Please provide a complete listing of those origin-destination pairs which have a service standard of overnight or two days where air transportation is utilized in part or whole.

RESPONSE:

- (a) That is the clear implication of the response to DBP/USPS-46.
- (b) Frequently, it is due to inadequate originating mail volume going to a particular destination ADC, which would make surface transportation infeasible. Air transportation is used rather than using small vehicles, like station wagons, to haul minimal volumes of mail to destinations up to 12 hours away.
- (c) N/A
- (d) Excluding some very small volumes that are flown into remote locations such as associated islands in HI, AK, VI and PR, the vast majority of Overnight mail travels by surface transportation. Unfortunately, due to the reasons outlined in our supplemental response to DBP/USPS-17b, the Postal Service does not have the ability, at this time, to distinguish the intended delivery day of mail being flown between air stops. Nor does the Postal Service currently have a systematic way of identifying the specific postal facility which generated the volume emanating from a particular air stop in order to produce an "origin-destination" list of Overnight and 2-Day pairs that may use "air transportation" in "part or whole."