

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate Commission
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Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
(April 5, 2004)

The United States Postal Service hereby provides its response to the following interrogatory of David Popkin, dated March 22, 2004: DFC/USPS-149. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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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 all parties of record.

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April 5, 2004
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DBP/USPS-149 Lines 12-16 of Page 13 of the Testimony state that establishment of service standards is a dynamic undertaking and that there was a moratorium on requests from the field for adjustments in First-Class Mail service standards. Lines 16-17 indicate that the moratorium has been lifted.

[a] What date was the moratorium lifted?

[b] Please provide a copy any notices that were sent to the field advising either that the moratorium was lifted and/or the procedures to be followed in requesting adjustments.

[c] Please provide a listing of all requests for adjustments in First-Class Mail service standards that have been received from the field since the lifting of the moratorium. This listing should include, as a minimum, the date of the request, the adjustment desired, the justification for the adjustment, the action taken by headquarters, and the date of implementation, if any.

[d] Please provide copies of all requests and related correspondence received since the lifting of the moratorium.

RESPONSE:

In large measure, the Postal Service finds this interrogatory objectionable as requesting information that is immaterial and irrelevant to the core issues in this proceeding. Nevertheless, the Postal Service will respond as indicated below. As has been its custom with this intervenor in this proceeding, the Postal Service elected to waive its objection to DBP/USPS-149, based upon the hope, apparently vain, that DBP/USPS-149 represented a limited incursion into immaterial matters. That hope has been dashed by the filing of interrogatories DFC/USPS-150-156 today. Accordingly, notwithstanding the provision of the responsive materials below, the Postal Service reserves the right to object to the interrogatories filed today that veer even further away from the substance of this proceeding.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GANNON
TO INTERROGATORIES OF DAVID POPKIN

RESPONSE to DBP/USPS-149 (continued)

- (a) The moratorium on Service Standard change requests was orally communicated to the Area offices. Its purpose was to allow the 2 & 3-Day Service Standard Realignment Model to be fully implemented before any adjustments were made. We began considering requests for Service Standard changes as of May 19, 2001.

- (b) There was no formal written notice sent out to remind Area offices that the moratorium was being lifted on or about May 19, 2001, or at any subsequent time. The relevant procedures are outlined in documents referenced in the response to DFC/USPS-T1-24.

- (c) Shown below is a chart which reflects the formal requests for FCM Service Standard Changes that have been submitted since May 19, 2001:

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GANNON
TO INTERROGATORIES OF DAVID POPKIN

**Listing of Requests for Adjustments in FCM Service Standards
since May 19, 2001 in Response to PRC Interrogatory DBP/USPS-149-C**

#	Request Date	Adjustment Desired	Proposed Justification	Action Taken by Headquarters	Implementation Date, If Any
1	4/26/2002	Upgrade all Reno-Las Vegas NV pairs to become 2-Days (reciprocally). A total of 40 3-Digit Pairs.	Maintained that they had previously requested such a change, and that the pairs had been downgraded "by error" in FY-01 Realignment.	Approved	5/18/2002
2	6/27/2002	(A) Downgrade Originating 2-Day standard from Suburban MD 208-209 to Indianapolis IN 460-469, 471-479 (B) Change the Destinating Service Standards for Gary IN (with 78 Destinating Downgrades to 3-Day and 92 Destinating Upgrades to 2-Day)	(A) Inadequate 2-Day Volume to warrant surface transportation and that the other Capital Metro Plants are 3-Day to Indianapolis. (B) Change the Service Standards into Gary IN because it was reassigned from ADC Indianapolis IN into ADC Chicago IL.	(A) Not Approved (B) Approved	(A) N/A (B) 9/7/2002
3	6/28/2002	Requested Adjustments to the Originating standards for Missoula MT 598 and Kalispell MT 599, involving 14 Upgrades and 12 Downgrades	Both cities were excluded as "Outliers" from Originating Service Standard changes made in the 2 & 3-Day FCM Realignment Model. Changes needed due to transportation constraints.	Approved	9/7/2002
4	11/6/2002	Downgrade Grand Rapids MI and Traverse City MI, reciprocally, from 1-Day to 2-Days	Distance between cities and Drive Time involved is too great.	Denied	N/A
5	11/25/2002	Downgrade the Originating 2-Day Standards from Las Vegas NV to Albuquerque MN and from Las Vegas NV to Fresno CA to a 3-Day Standard.	Poor Performance Scores in EXFC	Denied	N/A
6	3/5/2003	Downgrade from 2-Days to 3-Days the following: NY Metro Area to ADC Columbus OH NY Metro Area to ADC Greensboro NC NY Metro Area to ADC Raleigh NV NY Metro Area to ADC Roanoke VA	3-Day Exceptions were granted to the same offices as Origins into the NY Area as a Destination, and they desired the standards to be reciprocal.	Denied	N/A
7	3/6/2003	(A) Downgrade Grand Rapids MI and Traverse City MI, reciprocally, from 1-Day to 2-Days (B) Upgrade Traverse City MI to Gaylord MI from 2-Day to Overnight	Distance between cities and Drive Time involved is too great. Downgrade approval linked to Upgrade offer.	(A) Denied (B) Denied	N/A
8	5/29/2003	Downgrade the Origin of Mogan Station NY to ADC Columbus OH from 2-Day to 3-Day	Morgan P&DC clears their Originating Mail too late to make the 2-Day connection to ADC Columbus OH	Denied	N/A

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GANNON
TO INTERROGATORIES OF DAVID POPKIN

9	7/7/2003	Downgrade the Origin of Mogan Station NY to ADC Columbus OH from 2-Day to 3-Day	Morgan P&DC clears their Originating Mail too late to make the 2-Day connection to ADC Columbus OH	Denied	N/A
10	3/10/2004	See Listing of proposed changes below	Realignment of processing responsibilities within the Erie District	Pending	N/A

Originating Service Standard Changes Proposed by the Erie PA District				
Origin ZIP	Dest ZIP	Current Standard	Proposed Standard	Change Type
158	150	2	1	Upgrade
158	151	2	1	Upgrade
158	153	2	1	Upgrade
158	154	2	1	Upgrade
158	163	1	2	Downgrade
158	167	1	2	Downgrade
163	147	2	1	Upgrade
163	167	2	1	Upgrade
163	150	1	2	Downgrade
163	151	1	2	Downgrade
163	158	1	2	Downgrade
163	160	1	2	Downgrade
163	162	1	2	Downgrade
167	152	2	1	Upgrade
167	161	2	1	Upgrade
167	163	2	1	Upgrade
167	164	2	1	Upgrade
167	165	2	1	Upgrade
167	158	1	2	Downgrade
Destinating Service Standard Changes Proposed by the Erie PA District				
Origin ZIP	Dest ZIP	Current Standard	Proposed Standard	Change Type
166	158	2	1	Upgrade
168	158	2	1	Upgrade
163	158	1	2	Downgrade
167	158	1	2	Downgrade
167	163	2	1	Upgrade
158	163	1	2	Downgrade
160	163	1	2	Downgrade
161	163	1	2	Downgrade
162	163	1	2	Downgrade
167	164	2	1	Upgrade
167	165	2	1	Upgrade
163	167	2	1	Upgrade
164	167	2	1	Upgrade
165	167	2	1	Upgrade
158	167	1	2	Downgrade

(Attachment to response to DBP/USPS-149(c))

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RESPONSE TO DBP/USPS-149 (continued)

(d) The responsive documents will be filed in USPS Library Reference C2001-3/17 on April 6, 2004.