

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

SUPPLEMENTAL RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS GANNON  
TO INTERROGATORY OF DOUGLAS CARLSON  
(May 4, 2004)

The United States Postal Service hereby provides the supplemental response of witness Charles Gannon to interrogatory DFC/USPS-T1-31. The original response was filed on April 29, 2004. The supplemental response supersedes the original response. The interrogatory is stated verbatim and is followed by the supplemental response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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.

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May 4, 2004  
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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GANNON  
TO INTERROGATORIES OF DOUGLAS CARLSON

**Revised: May 4, 2004**

**DFC/USPS-T1-31.** Please refer to your testimony at pages 2–6 and your responses to DFC/USPS-GAN-58(d) and 64 and DFC/USPS-T1-10. Please confirm that the arrival time of the truck for two-day First-Class Mail from Reno to ADC Twin Valley CA is not consistent with the national model. If you do not confirm, please explain.

**RESPONSE:**

Not confirmed. The National 2 & 3-day Realignment Model did not model trips between specific Origins and specific Destinations. As previously described, the Model was only used to determine which 3-digit ZIP Code pairs qualified to be a 2-day standard. Once a pair has been determined to have a 2-day, or 3-day standard, based on the Model parameters, then the mode of transportation, departure time of transportation, arrival time of transportation, etc., is all locally determined in pursuit of meeting the established Service Standard in the manner deemed most appropriate, in a case-by-case situation.

The Model was only a proxy by which we determined a reasonable 2-day reach for First-Class Mail service standards from any given origin, using national parameters. However, once that standard was established (by the Model), it is up to the local Areas to determine the best way to meet that standard, based on their specific situations. Not only could they determine the mode of transportation, but Areas could, if they decided to on a case-by-case basis, allow specific Origins to get 2-day mail to them past the latest ETA time of 17:00, or even past the symbolic "18:00 CET", if they determined that they could still achieve the scheduled 2-day delivery.

There was no realistic way for a "model" to factor-in all the possible operational permutations that can occur in a real-time management & logistical environment. Nor did we try to achieve that. We allowed local management the necessary latitude to achieve the Service Standards in whatever fashion they deemed most appropriate for

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**RESPONSE to DFC/USPS-T1-31 (continued)**

their local circumstances. Therefore, the model did not model "trips" between specific Origins and specific Destinations (such as the Reno to ADC Twin Valley CA cited in DFC/USPS-T1-31), but just established national parameters by which to establish the standard, itself.