

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

INITIAL BRIEF OF DAVID B. POPKIN
August 12, 2004

Respectfully submitted,

August 12, 2004

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C20013II

In 2000 and 2001, the Postal Service implemented a number of changes in the services standards for the delivery of First-Class Mail in all of the ZIP Codes in 48 of the 50 states¹. The thrust of these changes was to downgrade considerable mail volume from a 2-day delivery standard to a 3-day delivery standard.

It would appear that these changes resulted from the use of a commercial computer program that calculated the drive time from Point A to Point B. The Postal Service then went and used this program to calculate an arbitrary drive time from each originating P&DC to the destinating ADC². It then looked at the computer output and if it was 12.049 hours or less, that path became a 2-day delivery standard and if it was 12.050 hours or more, that path became a 3-day delivery standard. This computer-derived drive time was probably a reasonable evaluation of the approximate drive time between Points A and B; however, it is still an approximation. It does not take into account the time of day, the day of the week, potential accidents or construction in the route, changes in the speed limit, the level of traffic, etc. However, what it does do is provide a precise number that allowed the Postal Service to arbitrarily categorize each path as either a 2-day or a 3-day delivery standard.³

¹ All states and the District of Columbia were affected other than Alaska and Hawaii. Possessions were not affected.

² An ADC usually serves a group of P&DCs.

³ This method of making an approximation and then utilizing it with absolute precision reminds me of a football game where the officials will determine the end of a run or pass and spot the ball on the field

This arbitrary division of each path into either a 2-day or 3-day delivery standard does not allow the Postal Service to provide efficient postal services as required by statute for the following reasons:

1. This method completely ignores the needs of the public.
2. This method does not take into account the volume of mail carried on that path.
3. This method does not take into account the actual arrival time of the mail at the destinating ADC.⁴
4. This method does not allow for reciprocal services standards between Points A and B.⁵
5. This method could force next-door neighbors in adjacent ZIP Code areas to have 3-day delivery standards between them.
6. This method will allow for a 3-day delivery standard between mailers located within the same state.

As a result of this proceeding, the Commission should issue a public report that will indicate that the Postal Service implemented these changes without the benefit of an advisory opinion from the Commission. It should also include a recommendation that the Postal Service implement a change in the delivery standards that will resolve the six items listed above.

Furthermore, the recommendation should state that the Postal Service take steps to improve the public's knowledge of the existing delivery standards. This could include maps on the collection boxes and in post office lobbies, providing countrywide delivery

at the approximate end of the run or pass and then once the ball is on the field, they will measure it with absolute precision using the chains to see if the first down has been achieved. The starting point for the 10 yards is also an approximation made at the beginning of the series of downs.

⁴ Either because the mail will arrive before the critical entry time or because air transportation is being utilized.

⁵ This results because the computer generated drive time is not calculated from P&DC to P&DC but is determined for each individual P&DC to the destinating ADC. Therefore, the calculated time from P&DC A to ADC B may be different [as to either be more or less than the dividing line of 12.049/12.050 hours] than the drive time for P&DC B to ADC A.

standard information on the Postal Service website, and adding the 2- and 3-day delivery EXFC results to the quarterly press release which is normally issued showing the overnight results.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

August 12, 2004

David B. Popkin