

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN [DBP/USPS- 6]
(May 20, 2005)

In accordance with Presiding Officer's Ruling No. R2005-1/10 (May 16, 2005), the United States Postal Service hereby provides its compelled responses to above-listed interrogatory of David Popkin, filed on April 8, 2005.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID B. POPKIN**

DBP/USPS-6 With respect to the delivery standards / commitments for First-Class Mail, I am interested in obtaining the criteria that are utilized to determine whether a given path will be committed for overnight, 2-day, or 3-day delivery. [a] Confirm that for any given ZIP Code pair [other than the military ZIP Codes] will be committed for delivery in three days or less. [b] Provide copies of any directives and guidelines that are utilized to determine those areas that fall into any or all of those three categories. [c] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive overnight service. [d] Is the minimum area that is overnight an entire 3-digit ZIP Code prefix, namely, if A to B is overnight then it is also overnight to all facilities with the same 3-digit ZIP Code prefix as B? [e] If A to B is overnight, then will all offices that are served by the P&DC/P&DF serving B be overnight from A? [f] Must overnight service be reciprocal, namely if A to B is overnight, then B to A will also be overnight. [g] Provide the guidelines that are utilized to determine those offices that will be included in the area to receive 2-day service. [h] Is the minimum area that is 2-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 2-day to all facilities with the same 3-digit ZIP Code prefix as B? [i] If A to B is 2-day, then will all offices that are served by the P&DC/P&DF serving B be 2-day from A? [j] If A to B is 2-day, then will all offices that are served by the ADC serving B be 2-day from A? [k] Must 2-day service be reciprocal, namely if A to B is 2-day, then B to A will also be 2-day. [l] Must all offices within a given state be overnight or 2-day from anywhere within the same state? [m] Must all adjacent ZIP Code areas be either overnight or 2-day service? In other words, any two neighbors may not have 3-day service between them. [n] Is the minimum area that is 3-day an entire 3-digit ZIP Code prefix, namely, if A to B is 2-day then it is also 3-day to all facilities with the same 3-digit ZIP Code prefix as B? [o] If A to B is 3-day, then will all offices that are served by the P&DC/P&DF serving B be 3-day from A? [p] If A to B is 3-day, then will all offices that are served by the ADC serving B be 3-day from A? [q] Must 3-day service be reciprocal, namely if A to B is 3-day, then B to A will also be 3-day. [r] Please indicate the guidelines that were utilized in Docket N89-1 along with any changes that have been implemented since then. In these guidelines, also indicate the minimum percentages of a facility's mail that would mandate a higher level of service. [s] Please discuss, explain, and provide appropriate data of any of the sub-parts d through q above that you are not able to provide an unqualified yes response.

RESPONSE:

- (a) Confirmed.
- (b) Please refer to PRC Op. N89-1, at Table I-1; Docket No. N89-1, USPS-T-2 at 6-7 and App. A at 7-8; Docket No. C2001-3 Gannon Declaration at ¶22 .(July 30, 2001)
- (c) See response to subpart (b).

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Response to DBP/USPS-6 continued:

- (d) Yes.
- (e) Yes.
- (f) No.
- (g) See response to subpart (b).
- (h) Yes.
- (i) Yes.
- (j) Yes.
- (k) No.
- (l) No.
- (m) No.
- (n) Yes.
- (o) Yes.
- (p) Yes.
- (q) No.
- (r) See the material cited in response to part (b), as well as page 16 of the Appendix referenced therein. There is no volume minimum that mandates a higher service standard.
- (s) Review the materials referenced in subparts (b) and (r).