

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- 167]
(September 21, 2005)

In accordance with Presiding Officer's Ruling No. R2005-1/81 (September 15, 2005), the United States Postal Service hereby provides its compelled response to above-listed interrogatory of David Popkin filed on June 16, 2005.

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

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-167 Please refer to your response to OCA/USPS-112 subpart c. [a] Please clarify your response. Should the second response to subpart c - i read upgraded from 3-day to 1-day : 16 as was asked in the original interrogatory? If so, please provide a listing of these 16 ZIP Code pairs, the date of the upgrade, and an explanation of how it was possible to upgrade them from 3 days to overnight. If not, please explain why you show two different values for upgraded from 2-day to 1-day, namely 16 in response to subsubpart i and 35 in subsubpart ii. [b] Please provide a listing of the 3 ZIP Code pairs that were downgraded from 1-day to 3-days, the date of the downgrade, and an explanation of why it was necessary to downgrade them from overnight to 3-day.

RESPONSE:

(a) Confirmed.

Although the identity of the following 16 specific ZIP Code pairs has no relationship to postal ratemaking, the requested information is being provided in response to this interrogatory, subject to the understanding that the Postal Service reserves the right to object in future proceedings to requests for similarly irrelevant and immaterial information.

From the following 3-digit ZIP Code areas -- 940 through 951, 954, 956, 957 and 958 -- to the following 3-digit ZIP Code: 966.

Due to the previously mentioned problems with data retention, the pair changes were calculated by comparing PQ 2-00 to PQ 2-03, thus it cannot be said exactly in which PQ the changes were made. All 16 service standards pairs originate in Northern CA to military destinations (966) that are processed out of San Francisco. The service standards used are only to the gateway office (San Francisco) rather than to actually delivery to Military destinations in 966 (overseas). The original standards were excessively long at 3-days, and were likely database errors. They were updated to be consistent with other 1-day standards for local mail to San Francisco.

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RESPONSE to DBP/USPS-167 (continued)

(b) From 967, 968, 969 to 966.

The language in the response to subpart (a) regarding relevance and materiality to postal ratemaking applies to this response as well. So does the language regarding data retention issues.

All 3 service standards pairs were military destinations (966) that are processed out of San Francisco that were all originating in Hawaii and Guam. The service standards used are only to the gateway office (San Francisco) rather than to actually delivery to military destinations in 966 (overseas), and the original standards were impossibly short at 1-day, and were likely database errors. The service standards were updated to be consistent with other 3-day standards for mail to San Francisco from Hawaii and Guam.