

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-17 AND 19-21)
(March 1, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin, filed on February 17, 2006: DBP/USPS-17, 19-21.

The interrogatories are stated verbatim and followed by the responses.

An objection to DBP/USPS-18 was filed on February 21, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
March 1, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-17

When a processing center is closed and/or consolidated, will this always affect both collection mail and presorted First-Class Mail? If not, please explain and provide the circumstances under which either one or the other but not both will be affected.

RESPONSE

Assuming the facility was engaged in the processing of originating First-Class Mail (collection and presorted) before closure, then all originating First-Class Mail that formerly was initially processed there would be initially processed at one or more nearby gaining facilities.

Assuming the facility was engaged in the processing of originating First-Class Mail (collection and presorted) before the consolidation and those operations are consolidated, then all such originating First-Class Mail that formerly was initially processed there will be initially processed at one or more nearby gaining facilities.

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DBP/USPS-19 Please refer to the Attachment to Witness Williams' testimony. [a] Please advise the time period and status that this listing of some 41 facilities represents. [b] Please provide a revised listing of these 41 facilities that shows the date on which the study commenced, the date on which final action was taken, a brief description of the proposed consolidation action, and the current status of each of these actions.

RESPONSE

The listing represents facilities that currently are the subject of Area Mail processing feasibility studies. The studies are in various stages of execution or review in accordance with procedures outlined in USPS Handbook PO-408. At an appropriate time, agency decisions disclosing proposed operational consolidations will be made public.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-20 The attachment to Witness Williams testimony' shows some 41 facilities. Library Reference N2006-1/5 has only ten decision packages. [a] Are these ten packages supposed to be representative of the 41 facilities shown on Attachment A? [b] If so, how were the ten specific facilities chosen? [c] If not, why not?

RESPONSE

- (a) No.
- (b) N/A
- (c) Whether or not these 10 facilities were representative of a larger universe was not deemed to be a necessary criterion for testing the administrative AMP review process on a larger scale than had historically been the case or to develop a Communications Plan that would be useful in such an environment.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-21 Worksheet 7 of Library Reference N2006-1/5 appears to indicate that ODIS data will be utilized. [a] Please explain why ODIS was chosen rather than EXFC. [b] Please provide a full discussion on the ODIS system including any handbooks on how the ODIS data is determined, presented, and evaluated.

RESPONSE

- (a) The ODIS/RPW system is designed to generate 3-digit ZIP to 3-digit ZIP mail class volume estimates for logistical planning that the EXFC system is not designed to generate. These ODIS estimates are useful in understanding the likely amount of First-Class Mail, for instance, that would be subject to an upgrade or downgrade if a change in the service standard applicable to a particular 3-digit ZIP Code pair were to be implemented. EXFC is not designed to provide similar data.
- (b) Please review Docket No. R2005-1, USPS Library Reference K-22, Handbook F-75, Data Collection User's Guide for Revenue, Volume, and Performance Measurement Systems, TL-2 (October 2003).