

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-71-73)  
(April 24, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin: DBP/USPS-71-73, filed on April 10, 2006. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

**DBP/USPS-71** Please refer to the response to Interrogatory DBP/USPS-42. [a] Please confirm, or explain if you are unable to do so, that with the exception of the advancing of the collection times of the 161 of 738 collection boxes in the Olympia WA area as noted in your response, there were no changes in the final collection times of the blue collection boxes or lobby drops at any of the associate offices or at the plants in the other ten consolidations as noted in Library References N2006-1/5 and /6. [b] Please explain why it was necessary to advance the collection times of the 161 boxes in the Olympia WA area including what changes, if any, were made in the times of the final dispatch to the plant at the affected offices [independent or subsidiary offices that had one or more of the 161 boxes under their jurisdiction].

**RESPONSE**

(a-b) Please review the response to DFC/USPS-2, which provides a more accurate depiction of the Olympia WA information to which you refer. Please also review the response to OCA/USPS-20(b)(iv).

No changes have been made for DOV into Olympia. The collection mail in Olympia will still come into the Olympia plant and then be dock transferred to the Tacoma plant. The transportation time between the Olympia P&DF and the Tacoma P&DC is 30 to 45 minutes, depending on traffic. For this reason, some collection boxes will have an earlier collection time to get mail into the Olympia plant earlier for dock transfer to Tacoma.

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**DBP/USPS-72** Please refer to your response to Interrogatory DBP/USPS-44. [a] Is it still current USPS Policy to require a slot in every post office to allow mailers to deposit mail that will receive a local postmark? [b] If not, what is the current policy and provide information on changes to that policy that have occurred. [c] What is the current USPS Policy with respect to having a separate blue collection boxes for the deposit of local mail including the locations where such boxes may be required? [d] Will mail deposited in the local collection boxes referred to in subpart c above receive a local postmark? [e] What changes have been made to this policy? [f] Please confirm, or explain if you are unable to do so, that when mailers present mail at a local retail window they may request and receive local postmarking for that mail. [g] Please provide copies of the current POM/DMM or other references that contain the current policy for each of the above.

(a-g) Current policy in reference to all of these questions is reflected in the Attachment to the response to DFC/USPS-5.

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**DBP/USPS-73** Please refer to your response to Interrogatory DBP/USPS-57. [a] Have there been any changes to the listings provided in Library Reference C2001-3/3 in the data provided for the 11 offices that have clearance time changes from the national standards or in the 17 outlier facilities? [b] If so, please provide the details and updated listings. [c] Have there been any changes in the mail processing in California as it relates to the establishment of "pseudo" ADCs? [d] If so, please provide the details. [e] Please confirm, or explain if you are unable to do so, that with the exception of the ZIP Code origin-destination pairs that are affected by the clearance time changes and outlier facilities described in Library Reference C-2001-3/3 [responses to Interrogatories DBP/USPS-33 and 37], the "pseudo" ADC activity in California, and any pair that might be erroneously entered into the data base, that all other ZIP Code origin-destination pairs are in compliance with the national standards. [f] Please advise the approximate percentage of ZIP Code origin-destination pairs that are in compliance with the national service standards. Please provide separate responses for overnight, 2-day, and 3-day standards as well as a combined response.

**RESPONSE**

- (a) The list has not changed.
- (b) N/A
- (c) Not yet.
- (d) N/A
- (e-f) In order to confirm that the currently published service standards for all of the approximately 850,000 ZIP Code pairs for each mail class are correct or otherwise described in your question, the Postal Service would have to manually examine the service standards indicated for each pair in the database on which the Service Standards CD-ROM is based and compare them to the appropriate definitions for each mail class. The exceptions noted in Docket No. C2001-3 were identifiable because they had recently been implemented. Errors get discovered during routine, task-oriented analysis of data for particular ZIP Code pairs. It is not known with any precision to what degree the database may contain exceptions or errors. The percentage of non-compliance is presumed to be very low.