

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN  
(DBP/USPS-73) [ERRATA]

The United States Postal Service hereby submits its revised response to the following interrogatories of David Popkin: DBP/USPS-73. The original response was filed on April 24, 2006. The revised response updates the answers to subparts (c) and (d). The responses to subparts (a), (b), (e) and (f) remain the same. The revised response filed today supersedes the original response. The interrogatory is stated verbatim and followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 18, 2006

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

**Revised: May 18, 2006**

**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) Yes, there have been changes.
- (d) During the application of the 2 & 3-Day Model parameters, there were four "pseudo" ADCs:

ADC TWIN VALLEY CA
ADC SEQUOIA CA
ADC PENINSULA CA
ADC SIERRA CA

Since that time, the mail formerly assigned to the Twin Valley ADC has been reassigned to ADCs in Los Angeles, Industry and Santa Clarita. The mail formerly assigned to the Sequoia ADC has been reassigned to ADCs in San Bernardino, Santa Ana and Santa

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**RESPONSE to DBP/USPS-73 (continued):**

Clarita. For that reason, the only two remaining "pseudo" ADCs are Peninsula and Sierra.

- (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.