

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268B0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-37-39, 42-43(a)
(September 23, 2009)

The United States Postal Service hereby provides responses to the above-listed interrogatories, dated September 9, 2009. 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 FROM DAVID POPKIN

DBP/USPS-37 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that your current response supersedes the responses provided in Dockets R2000-1 and R2001-1 as they relate to the specific question.

RESPONSE

Not confirmed. The response is the same, does not supersede earlier responses, yet acknowledges that unforeseen circumstances can affect a given circumstance, which is always true.

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

DBP/USPS-38 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that for any foreseen circumstance and that absent any unforeseen circumstance, natural disaster, accident, etc. that all outgoing mail which a carrier collects while delivering mail along their route or which an employee picks-up in response to a request for a pick-up will be processed and dispatched to the Processing Center on the same day, including Saturday, that it is collected or picked-up from the customer and will receive the same delivery standards for that day being Day 0. If necessary, make any distinctions based on the type of mail or type of carrier.

RESPONSE:

Please see the responses to DBP/USPS-28, 37.

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

DBP/USPS-39 Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that postal facilities that have delivery carriers operating out of them must have a scheduled direct or indirect trip to the Processing Center to allow for the mail collected along their route to receive same day dispatch upon their return to the facility.

RESPONSE:

Confirmed.

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

DBP/USPS-42 Please refer to your response to Interrogatory DBP/USPS-28. If there are any facilities where mail collected by delivery carriers along their routes is not routinely dispatched for processing the same day, either weekday or Saturday,

[a] how are the customers made aware of this condition?

[b] If they are not made aware of this condition, why not?

If necessary, make any distinctions based on the type of mail or type of carrier.

RESPONSE:

Please see the response to DBP/USPS-28; see also the response to

DBP/USPS-37. The response to DBP/USPS-28 does not suggest that there are

any facilities where mail collected by carriers is not routinely dispatched for

processing the same day, either weekday or Saturday.

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

DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-29. Your response is not clear as to whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time the customer gave the mail to the carrier.

[a] Please clarify your response.

[b] What time and corresponding delivery standard is utilized on Express Mail collected from a blue Express Mail collection box? Please advise whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time shown on the blue collection box.

RESPONSE:

- (a) The time is determined by the acceptance Post Office, after the carrier returns.
- (b) Objection filed.