

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-46-47
(October 13, 2009)

The United States Postal Service hereby provides responses to the above-listed interrogatories of David Popkin dated September 29, 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-46 Please refer to your response to Interrogatory DBP/USPS-38.

[a] Please explain why you are unable to confirm the scenario posed in Interrogatory DBP/USPS-38 since I have posed it such that the unforeseen circumstances that you show in the response to Interrogatory DBP/USPS-28 as an exception to this arrangement have been removed from the Interrogatory. Furthermore in your response to Interrogatory DBP/USPS-39 you indicate that all postal facilities that have delivery carriers operating out of them will have the necessary transportation to achieve the same day dispatch of mail collected by carriers along their routes and your response to Interrogatory DBP/USPS-42 indicates that such mail is routinely dispatched the same day.

[b] 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

(a) – (b) Absent unforeseen circumstances, the Postal Service attempts to dispatch all outgoing mail collected by a carrier to the processing center on the same day.

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DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-43 subpart a.

Your response is still not clear. If a carrier picks up an Express Mail article at a customer's location at 11 AM and returns to the office at 3 PM at which time the article is turned over to the acceptance clerk, will the article have an acceptance time and corresponding service standard of 11 AM or 3 PM or some other time [if some other time, please explain why that time was utilized].

RESPONSE

3 PM.