

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

SIX-DAY TO FIVE DAY STREET DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-1-24 AND 26-28
(April 28, 2010)

The United States Postal Service hereby provides its responses to the following interrogatories of David Popkin dated April 13, 2010: DBP/USPS-1 through 24 and DBP/USPS-26 through 28. Each interrogatory is stated verbatim and is followed by the response. An objection was filed to DBP/USPS-25 on April 23, 2010.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Pricing and Product Support

Michael T. Tidwell
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
April 28, 2010

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-1 [a] Please confirm, or explain if you are unable to confirm, that the mail which is placed in a post office box on Saturday under the proposed plan will be identical in makeup to that which presently exists. For example, mail posted on Friday to a post office box customer in the overnight service standard area, in the two-day service standard area on Thursday, and in the three-day service standard area on Wednesday will all be delivered on Saturday. Furthermore, it will apply to all categories of mail such as DPS mail, non-DPS mail, Priority Mail, Express Mail, parcels, standard mail, accountable mail, etc.

[b] Please confirm that all postal facilities that have post office box mail service on a weekday will have full post office box mail service on a Saturday and that there will be access to the box for at least 30 minutes after the "box up time"

[c] If not, please explain and advise the number and reason of the facilities that do not have this level of service.

RESPONSE

The Postal Service's intention under five-day delivery is to maintain its existing ability to deliver all mail to post office boxes on Saturday. This objective is feasible, although surmounting all challenges presented by non-letter shaped mail is a matter of ongoing development. Access to PO Box service also will not change from the current operating environment, in which some 479 locations do not provide weekend access.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-2

[a] Please advise whether the "box up time" for post office box customers is expected to change or remain the same under the proposed plan, particularly on Saturdays and Mondays. Please explain the reasons for your response.

[b] What is the current policy including manual citation as to whether the "box up time" should be uniform throughout an entire district as opposed separate times for each facility based on the needs of that facility? Please explain the reasons for your response.

RESPONSE

[a] Transportation schedules between the processing plants and Post Offices on Saturday may dictate slight adjustments to Saturday PO Box up time in some locations.

No change is expected for Monday box up times.

[b] No existing policy mandates district-wide uniformity in box up time; nor should such policy exist since local box up time must accommodate local conditions.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-3

- [a] Please explain how DPS mail is presently sorted to both sequence post office box mail vs. carrier delivery mail. Please indicate the "condition" or status of the mail that exists after each pass.
- [b] Please provide the same information requested in subpart [a] for the proposed plan.
- [c] Once the post office box mail has been fully sequenced, in what condition will the carrier delivery mail be?
- [d] What further steps, if any, will be required to place Saturday's carrier delivery mail in proper sequence for delivery on Monday?

RESPONSE

- a) The first DPS sortation pass separates the mail into the sequence order of the carrier route and/or Post Office boxes. The mail is then run on a second pass to sort the mail to each carrier route or Post Office Box section.
- b) The first DPS sortation pass will isolate all Post Office Box mail into a single holdout and sequence all carrier delivery mail. The Post Office Box mail will be processed on a DPS first pass to separate the mail into sequence order and a second pass to sort it by ZIP Code. Compared to today, this results in one additional handling.
- c) The carrier delivery mail will be in sequenced order through first pass, awaiting second pass for the next scheduled delivery day.
- d) The carrier delivery mail will require a second pass distribution for the next scheduled delivery day. This adds no additional handling for carrier delivery mail compared to today.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-4

What are the normal number and maximum number of bundles that a delivery carrier will utilize under the present system and what will it be under the proposed plan? Please describe the content of each of the bundles.

RESPONSE

Five-day delivery entails no change in carrier handling, nor the content, of bundles. The Postal Service uses the term bundle to define the number of sources of mail.

Park and loop, and foot carriers are limited to carrying three bundles by contract.

In a non-FSS site, park and loop bundles would include:

- 1) DPS letters
- 2) Residual mail – residual letters cased with flats
- 3) Sequenced set (could be multiple sets collated together to make one bundle)

FSS city park and loop routes bundles include:

- 1) Delivery Point Sequenced (DPS) letters in sequenced delivery order
- 2) Flat Sequencing System (FSS) flats in sequenced order for delivery
- 3) Residual letters and flats –Residual letters and flats are cased together into a vertical flat case. If a sequenced set or sets is available, the residual mail is collated upon pulldown with the sequenced or FSS mail to maintain one bundle.

No contractual limit on the number of bundles exists for curb and centralized motorized routes. Bundles on such routes would include:

- 1) DPS letters
- 2) FSS flats
- 3) Residual letters and flats
- 4) Sequenced sets

However, some rural and CDS carriers may case most mail into the carrier case, thus effectively having only one bundle for delivery.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-5

- [a] What types of mail are processed on DPS?
- [b] What percentage of the mail of each type is presently processed as DPS mail?
- [c] What are the goals for the future?

RESPONSE

- a) Automation compatible letter mail.
- b) The DPS volume represents approximately 91 percent of all letter mail for city carrier route zones.
- c) To continue identifying mail or zones that can be added.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-6

Please describe the processing that will be necessary to obtain all of the non-DPS mail that is destined for Saturday post office box delivery and how this mail will be separated from the carrier delivery route mail that would have been delivered on Saturday under the present system but will now be delivered on Monday under the proposed plan? Will that carrier delivery mail be processed on Saturday or Monday?

RESPONSE

There will be no change to non-DPS mailflows. All mail for non-DPS zones will be sorted as it is today. All Post Office Box mail will be delivered on Saturday. All carrier delivery route mail will be delivered on the next scheduled delivery day.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-7

- [a] Has any consideration been given to establishing unique 5-digit ZIP Codes for segregating post office box mail delivery vs carrier route delivery mail?
- [b] Please describe the effect such a change of address would have on existing post office box customers.
- [c] Please fully explain your response.

RESPONSE

- a) During the development of the service change initiative under review in this docket, the feasibility of segregating 5-digit ZIP Codes on the basis of Post Office Box and street addresses was discussed among members of the cross-functional Five-Day Team, but was not pursued or proposed as a systemwide option for simplifying sortation in a 5-day street delivery environment. For reasons unrelated to 5-day street delivery, it is assumed that local proposals to evaluate such changes in isolated cases may be examined and considered, taking into account the limited number of available 5-digit ZIP Codes.
- b-c) When such changes are implemented, box customers could be required to notify their correspondents of their new address/ZIP Code.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-8

Please confirm, or explain if you are unable to confirm, that the proposed plan will now place a greater significance on the level of Friday's retail window service and final collection and dispatch times than presently exists [this would be due to the loss of mail processing on Saturday causing the mail to be delayed until Monday].

RESPONSE

Not confirmed. The Postal Service will follow its current policy for handling of final collection mail and dispatch operations in the five-day delivery environment, which calls for dispatch of all mail every evening.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-9

[a] Please advise the level of service that the Postal Service plans to provide for each of the federally observed holidays should that holiday fall on a Friday, Saturday, Sunday, or Monday.

[b] Please advise the level of service that the Postal Service plans to provide on days that are not the actual holiday but are associated with a nearby holiday, such as Christmas Eve, New Year's Eve, Thanksgiving Friday and/or Saturday, a long holiday weekend, etc.

[c] To what extent does the Postal Service celebrate and reduce the level of service for a non-federally observed holiday such as Good Friday in the Caribbean District?

RESPONSE

No changes in operations for holiday processing of mail will be required in five-day delivery beyond what is necessary to recognize that Saturday is a non-delivery day.

[a] Friday or Saturday Holiday– No carrier delivery service provided Friday, Saturday, Sunday. Monday – Return to normal service levels. Delivery managers will plan for additional mail volume and packages for delivery after the holiday weekend.

Sunday and Monday Holiday – celebrated Monday. No carrier delivery service provided Saturday, Sunday or Monday. Tuesday – Return to normal service levels. Delivery managers should plan for additional mail volume and packages for delivery after the holiday.

[b] Five-day delivery does not entail changes to operations for days immediately before or after holidays. At the national level, the Postal Service does not direct diminution of service. On the day after Thanksgiving and similar dates around widely observed holidays such as Christmas and New Years, field officials are encouraged to use their discretion and decide how best to accommodate the service needs of local

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-9 (continued)

customers. If anticipated community service needs are reduced due to local business closings, afternoon post office hours and collection activity may be reduced, with notice provided to local customers regarding those reductions.

[c] The Commonwealth of Puerto Rico celebrates four local holidays which impact on Postal Service Operations. On three holidays: Three Kings Day (January 6), Good Friday, and Constitution Day of Puerto Rico (July 25) postal facilities are closed with no retail, delivery or collection services provided. On Puerto Rico Discovery Day (November 19) the day is treated as a Saturday for retail service and for collections.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-10

[a] For each of the 70-some odd postal districts in the country, please advise the percentage of the facilities that have retail window service on Saturday. Please provide a separate percentage considering main offices only and a second percentage for all facilities including stations and branches.

[b] Please advise the current policy including any manual citation on whether a given facility may or must have Saturday window hours and if so, the minimum number of hours of service.

[c] Please advise the current policy including any manual citation on the minimum number of hours of retail window service on a weekday.

RESPONSE

[a] Approximately 87 percent of classified facilities identified as a Main Office have existing Saturday retail hours. Eighty two percent of all facilities identified as Delivery and Retail locations (which also includes stations and branches) have existing Saturday retail hours.

[b] The current policy on Saturday window service is located in POM section 126.42:

Window service is provided on Saturdays if there is a demonstrated need. Normally, such service does not exceed 4 hours. Postmasters must obtain approval from the next higher management level if more hours are necessary to meet customer needs. At financial units serving business areas, or facilities serving communities where many residents leave on weekends, retail service may be closed if service is available at other postal units, contract stations, or self-service postal centers. Postmasters must post signs telling customers of locations and hours of such services.

[c] The current policy on weekday retail window service hours is located in POM sections 126.411-12:

126.411
Postmasters provide all retail services for 8½ or more hours on nonholiday weekdays, unless otherwise authorized by the district manager, Customer

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-10 (continued)

Service and Sales. Retail service hours are scheduled to meet the needs of local postal customers. When the postmaster determines that additional service hours are necessary to meet community needs, employee work schedules are adjusted to provide such service. Postmasters must obtain approval of the next higher management level for increasing workhour usage if additional costs are involved.

126.412

Main Post Offices and other postal units in business areas are usually open during the hours kept by that business community. Stations and branches are not required to be open at the same scheduled hours as main offices. Stations and branches can adjust retail service hours to meet the needs of the local community. Stations and branches in suburban communities and/or large shopping centers may provide late evening service for customer convenience if needed and approved by the district manager, Customer Service and Sales. Postmasters must inform customers of service hours, using any available means to advertise those hours.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-11

Please confirm, or explain if you are unable to confirm, that all post office boxholders will have the ability to interact with a postal employee six days a week for at least 30 minutes after the "box up time" for the purpose of picking up an article that will not fit in the box or accountable mail. This interaction should be a public arrangement as opposed to an informal arrangement.

RESPONSE

See the responses to DBP/USPS-1 and 2. The Postal Service has no such 30 minute standard, but it ensures that PO Box customers have sufficient time after the posted box up time to pick up any articles requiring signature or that are too large to fit in the receptacle. Five-day deliver does not change these practices.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-12 Please confirm, or explain if you are unable to confirm, that all post offices that have a delivery service will have a formal means on Saturday for delivery customers to claim mail for which a claim notice was left during the week.

RESPONSE

Not confirmed, but this does not constitute a change from existing practice. See the response to DBP/USPS-1. Five-day delivery itself effectuates no change to current practice, although weekday retail hours may be increased in some locations...See USPS-T-3, at 14.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-13

- [a] Please confirm, or explain if you are unable to confirm, that all post offices providing retail window service on Saturdays will accept Express Mail.
- [b] Please confirm, or explain if you are unable to confirm, that exclusive Express Mail blue collection boxes will be collected on Saturday unless the box is not accessible.
- [c] Will Saturday collections be made for Express Mail deposited in an Automated Postal Center [APC]?
- [d] If not, why not?
- [e] Please advise any other means that customers will have to originate Express Mail on a Saturday.
- [f] Please confirm, or explain if you are unable to confirm, that all Express Mail originated on a Saturday as indicated in subparts [a], [b], [c], and [e] above will be dispatched on Saturday and achieve delivery starting on Sunday.
- [g] Please confirm, or explain if you are unable to confirm, that Express Mail requires an acceptance employee to process and endorse all outgoing Express Mail.
- [h] Will this acceptance be performed at the local office?
- [i] If not, where will it be performed and will this employee have knowledge of the induction time of the mailpiece so as to make the proper entry and provide the correct guarantee delivery time?
- [j] If not, why not?

RESPONSE

[a] It is expected that all Post Offices providing retail services on Saturdays in the five-day environment will accept Express Mail on Saturdays.

[b] Postal Service policy consists of a commitment to collect all Express Mail on Saturday, including dedicated collection boxes in all locations. Notwithstanding, anecdotal and preliminary evidence suggests that the policy is not in universal effect. See the response to DBP/USPS-14.

[c] APC's are generally installed in postal retail centers. Any Express Mail deposited in an accessible APC by the posted collection time is expected to be collected, accepted and transported on Saturday.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-13 (continued)

[d] N/A

[e] Customers will be able to tender Express Mail across a retail counter, through an APC Center, and through a dedicated Express Mail collection box.

[f] All Express Mail accepted on Saturday is expected to be dispatched and entered into the Express Mail system for delivery in accordance with applicable service standards.

[g] Confirmed.

[h] Express Mail acceptance will be performed at the local office for pieces inducted via the retail window, APC, Express Mail box located outside a Post Office, and any Express Mail pieces brought into the local office from any Express Mail collection box located elsewhere.

[i] Any employee performing acceptance of Express Mail is expected to have the knowledge necessary to completion of that task.

[j] N/A

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-14

- [a] Please advise the number of blue Express Mail collection boxes that are in service at locations at a post office.
- [b] How many of these boxes do not have a collection made on Saturday?
- [c] Please explain the reason[s] why the boxes noted in subpart [b] do not have a collection on Saturday.
- [d] Please advise the number of blue Express Mail collection boxes that are in service at locations at other than at a post office.
- [e] How many of these boxes do not have a collection made on Saturday?
- [f] Please explain the reason[s] why the boxes noted in subpart [e] do not have a collection on Saturday.

RESPONSE

- [a] A total of 2,735 Express Mail collection boxes located outside of Post Offices.
- [b] Preliminary data suggest that a few percent are not collected on Saturday.
- [c] No national level information has been found explaining why. This circumstance is currently undergoing research.
- [d] A total of 2,567 Express Mail collection boxes in service are not co-located with a postal facility.
- [e] Preliminary data suggesting that around 1 in 5 are not collected on Saturday are not thought to be accurate and are undergoing review.
- [f] See the response to DBP/USPS-14(c).

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-15

[a] Please advise the number of Automated Postal Centers [APC] that are in service at locations at a post office.

[b] How many of these APCs do not have a collection made on Saturday?

[c] Please explain the reason[s] why the APCs noted in subpart [b] do not have a collection on Saturday.

[d] Please advise the number of APCs that are in service at locations at other than at a post office.

[e] How many of these APCs do not have a collection made on Saturday?

[f] Please explain the reason[s] why the APCs noted in subpart [e] do not have a collection on Saturday.

RESPONSE

[a] Records show 2,253 APCs are installed at and operating.

[b] While records suggest that 122 APCs do not have Saturday collections, this issue is being researched.

[c] No explanatory information exists at the national level, which is why research is being undertaken.

[d] Virtually all APC's are co-located with classified retail units.

[e] N/A

[f] N/A

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-16

[a] Please confirm, or explain if you are unable to confirm, that the Postal Service presently has a \$12.50 additional charge for Express Mail scheduled for a Sunday or holiday delivery.

[b] Is it proposed to also apply an additional charge for Express Mail which is scheduled for Saturday delivery at a location other than a post office box or Hold for Pickup at a post office?

[c] If the response to subpart [b] is yes, will it be the same charge as will exist for Sunday/holiday delivery and if so, what are the reason[s] for not having a reduced charge on Saturday?

[d] Is it proposed to also apply an additional charge for Express Mail which is scheduled for Saturday delivery at a post office box or Hold for Pickup at a post office?

[e] If the response to subpart [d] is yes, what are the reason[s] for imposing this charge?

RESPONSE

a) Confirmed.

b) No such proposal is a part of the request in this docket.

c-e) N/A

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-17

[a] Please confirm, or explain if you are unable to confirm, that the Postal Service has two lists related to Sunday and holiday delivery of Express Mail. One list shows those ZIP Codes to which physical delivery will be made to a street address location and the second list shows those ZIP Codes to which delivery will be made to a post office box.

[b] For those ZIP Codes listed in the first list, will delivery be attempted at all addresses utilizing that ZIP Code other than post office boxes, in particular at rural and /or HCR delivery addresses that may be located some distance from the post office?

[c] For those ZIP Codes listed in the second list, will delivery be possible if the post office box customer must sign for the mail and if so, how will this be accomplished?

[d] If an Express Mail article is guaranteed for Sunday or holiday delivery and the customer paid both the basic Express Mail postage and the Sunday/holiday delivery fee and delivery is not made by the guaranteed time, will the sender be able to have the total postage refunded?

[e] If not, why not?

[f] Please confirm, or explain if you are unable to confirm, that in order to determine whether an article can be guaranteed for Sunday/holiday delivery there must be transportation to the 3-digit ZIP Code area and then the specific 5-digit ZIP Code must be on the appropriate list.

[g] As a result of the proposal made in this Docket, are there any changes contemplated for the Sunday/holiday Express Mail listings and if so, what are they?

RESPONSE

[a] Confirmed.

[b] Yes.

[c] Delivery is possible for signature required pieces during hours of retail operation.

[d] Yes

[e] N/A

[f] Confirmed.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-17 (continued)

[g] Implementation of five-day delivery is not anticipated to trigger any such changes. Also possible, however, are requests for *ad hoc* adjustments from field officials.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-18

- [a] Will there be a listing of those ZIP Codes for which Saturday delivery of Express Mail can be achieved for mail addressed to a street address?
- [b] If not, why not? If so, what will the relationship to the similar Sunday/holiday listing?
- [c] Will there be a listing of those ZIP Codes for which Saturday delivery of Express Mail can be achieved for mail addressed to a post office box or Hold for Pickup?
- [d] If not, why not? If so, what will the relationship to the similar Sunday/holiday listing?
- [e] What will the relationship between the guaranteed time of delivery on Saturday of Express Mail addressed to a post office box or Hold for Pickup mail and the accessibility to the box to claim the article that has a waiver of signature and an accessibility to an employee if it is necessary to sign for the mail and/or the article is too large for the box and/or it is being held for pickup? In other words, is there a realistic delivery of Express Mail on a Saturday to a post office box holder and/or a Hold for Pickup recipient?
- [f] Will the originator of the Express Mail be able to determine at the time of mailing from the originating post office what the guaranteed time of delivery is and what the accessibility will be at the delivery office so as to determine the likelihood of a successful delivery?
- [g] If not, why not?
- [h] Will it constitute a valid delivery of an Express Mail article for purposes of meeting the guarantee if the notice of delivery is placed in a post office box prior to the guaranteed delivery time but the box holder does not have access to the box and/or the postal employee to claim the article?
- [i] If so, please explain the rationale for that policy.
- [j] Will it constitute a valid delivery of an Express Mail article for purposes of meeting the guarantee if a Hold for Pickup article arrives in a post office prior to the guaranteed delivery time but the recipient does not have access to the postal employee to claim the article?
- [k] If so, please explain the rationale for that policy.

RESPONSE

[a]-[e] There are no plans for such listings because Saturday delivery of Express Mail is not impacted by five-day delivery.

[f] Yes, the sender will receive a guaranteed time of delivery, which hinges on the accessibility of the destinating Post Office.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-18 (continued)

[g] N/A

[h] The guaranteed time and day of delivery is dependent on Post Office accessibility so this situation should never occur.

[i] If the PO Box section does not have Saturday accessibility the delivery commitment will be Monday.

[j] The guaranteed time and day of delivery is dependent on Post Office accessibility so this situation should never occur.

[k] Absent Saturday retail hours the delivery commitment will be Monday.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-19

[a] Please confirm, or explain if you are unable to confirm, that for most places in the country there are two different overnight Express Mail service areas - one where the mail is processed on the FedEx network and the other which is limited to nearby areas only since the FedEx network is not operating.

[b] Please describe the processing of Express Mail that utilizes the FedEx network including the method of processing for an article currently mailed on a Saturday in order to achieve Monday delivery.

[c] Please indicate the days on which the FedEx network will not be in service and overnight Express Mail will be limited to nearby areas rather than the "full network", such as Saturday acceptance for delivery on Sunday.

[d] Please provide a schedule of the FedEx network both for a normal week as well as on and around holidays.

[e] Please respond to subparts [a] through [d] as proposed under the pending Docket.

RESPONSE

a. Not confirmed. For each originating ZIP Code, there is an overnight Express Mail service area and a non-overnight Express Mail service area. Express Mail within either service area may be transported on the FedEx network, by commercial air carriers, or by surface transportation. The scope of the overnight Express Mail service area is determined by various criteria, as explained in response to interrogatory DFC/USPS-7 in this proceeding.

b. The night-turn FedEx network that supports Express Mail during the week is not in service on Saturday and Sunday, so Express Mail accepted on Saturday does not travel on the FedEx network. Express Mail items that are accepted on Saturday and that require air transportation are transported to the airport. These items are tendered to commercial flights to reach their destination.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-19 (continued)

c. The night-turn FedEx network that supports Express Mail is not in service on Saturday and Sunday. Express Mail accepted on Saturday utilizes surface and commercial air for transportation. As explained in response to part (a), the overnight Express Mail service area for a given ZIP Code is not necessarily restricted to the area that can be served via surface transportation within the relevant timeframe.

d. The night-turn FedEx network operates Monday to Friday in a non-holiday week. The night-turn FedEx network for a holiday week depends on whether the holiday is widely observed or a non-widely observed holiday. Widely observed holidays include Memorial Day, Independence Day, Labor Day, Thanksgiving Day, Christmas Day and New Years Day. The night-turn FedEx network does not operate the night of the holiday (e.g., if Labor Day is observed on a Monday, the night from Monday evening to Tuesday morning). Non-widely observed holidays include Martin Luther King Day, Presidents Day, Columbus Day and Veterans Day. The night-turn FedEx network operates its normal week schedule with respect to these holidays.

e. As explained in response to interrogatory DFC/USPS-10 and elsewhere, the proposal at issue in this proceeding would not affect the processing of Express Mail. Therefore, the responses to (a)-(d) above are unaffected.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-20

Please confirm, or explain if you are unable to confirm, that just as mail now travels on Sunday under the proposed Docket mail will travel on Saturday and Sunday. In other words, First-Class Mail that enters the system on Friday will be delivered on Monday except for those few areas that have 4-day or 5-day standards and for mail addressed to a post office box in an overnight area which will be delivered on Saturday.

RESPONSE

Confirmed.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-21

- [a] Please confirm, or explain if you are unable to confirm, that the Postal Service is proposing to eliminate outgoing mail processing [except for Express Mail] on Saturday which includes the collection of mail from delivery customer locations, blue collection boxes, and post offices; the local preparation of the mail; transportation to the plant, and mail processing at the plant.
- [b] Please advise any other activities that are related to the elimination of outgoing mail processing on Saturday.
- [c] What is the total annual savings for this entire function?
- [d] Provide a breakdown of the separate functions that combine to the total provided in response to subpart [c].
- [e] What is the total annual cost for providing all of the above related functions for the processing of outgoing Express Mail on Saturday?
- [f] Provide a breakdown of the separate functions that combine to the total provided in response to subpart [e].
- [g] What would the added annual cost be to make a normal Saturday collection from blue collection boxes?
- [h] What would the added annual cost be to make a Saturday collection from the blue collection boxes located in front of postal facilities?
- [i] What would the added annual cost be to make a Saturday collection from the blue collection boxes located in front of main office only postal facilities?
- [j] What would the added annual cost be to make a Saturday collection from the lobby drops located in postal facilities?
- [k] What would the added annual cost be for local preparation of the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?
- [l] What would the added annual cost be for the transportation to the plant of the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?
- [m] What would the added annual cost be for the operation of the plant to process the mail acquired by each of the scenarios noted in each of the subparts [g] through [j] as well as mail received over the local retail window?
- [n] What would the added annual cost be for any added costs that are necessary on Sunday or Monday due to the failure to complete certain actions on Saturday, for example, presently some offices will make an early morning collection on the Tuesday following a Monday holiday? Please enumerate what these added costs would be caused by and the individual costs.
- [o] Please provide, in detail, how each of the cost figures above was calculated.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-21

- a. The Postal Service has proposed eliminating Saturday delivery and outgoing sorting on Saturdays, as described by witnesses Pulcrano, USPS-T-1, Granholm, USPS-T-3, Neri, USPS-T-4 and Grossmann, USPS-T-5. The operational analysis supporting the cost savings contemplated general operational changes including those on the supplied list. Within its comprehensive proposal, however, the Postal Service had no need to identify each particular operational change as relating exclusively to a particular aspect of the overall set of service changes, as the Postal Service's proposal is supported by a comprehensive set of estimated cost savings.
- b. For a discussion of the anticipated changes in mail processing operations, please see the testimony of witness Neri, USPS-T-4. For a discussion of the anticipated changes in delivery operations, please see the testimony of witness Granholm, USPS-T-3, and for a discussion anticipated changes in transportation, please see the testimony of witness Grossmann, USPS-T-5.
- c. The “entire function” described in the question includes some mail processing, some transportation and some delivery activities. As explained in the response to DFC/USPS-T2-3 (redirected from witness Corbett to the Postal Service), the Postal Service has not conducted the alternative detailed operational analyses that would be necessary to provide an estimate for any alternative service change scenarios, including the one posed in this question.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-21 (continued)

- d. Please see the answer to part (c) above.
- e. Please see the answer to part (c) above
- f. Please see the answer to part (c) above
- g.-m. The Postal Service has not studied these alternatives and does not have the requested cost estimates. See the Postal Service's response to DFC/USPS-T2-3 (redirected from witness Corbett).
- n. The Postal Service does not anticipate any systemic failures to complete actions on Saturdays in a five-day environment, hence it anticipates that except in isolated and unpredictable instances, there will be no such costs added to Monday or Tuesday. This is not to say that there will be no additional costs occurring on Monday as a result of the movement to five-day delivery. One example was noted by witness Granholm, USPS-T-3 at 17-18, suggesting that additional Monday collections may be needed. As indicated in USPS-LR-N2010-1/3, page 6 "241,625 city carrier work hours were added back to cover the time that may be necessary to perform limited collections during a weekend or early collections on Mondays, or Tuesday after a holiday." Given the city carrier wage for FY 2009 for full-time city carriers of \$41.74 (see Colvin, USPS-T-7, Attachment 1) and also \$106.70 of service wide benefits per \$1000 of salary and benefits (see Colvin, USPS-T-7 at 8) this is an additional cost of \$11.161 million. The second "added cost" is identified by witness Neri, USPS-T-4 at 17, where he

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-21 (continued)

says “The processing of mail for delivery on the day after a holiday, especially when the holiday falls on a Friday, Saturday or Monday, will require additional workhours.” The specific hours are 110,404 clerk and mail handler and 10,404 supervisor hours. Applying the calculations provided by witness Colvin, USPS-T-7 at 14, Table 4, the annual cost is \$5.427 million.

- o. See response to part (n).

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-22

- [a] Please provide a listing of those plants that presently consolidate their Saturday processing to another plant.
- [b] Please discuss the items that are considered before making a Saturday only consolidation.
- [c] What internal and external notifications or approvals are necessary to establish a Saturday only consolidation?
- [d] Please provide a listing of those plants that are under consideration for a Saturday only consolidation. Please show the current status and potential annual cost savings.

RESPONSE

a-d) Saturday only consolidation opportunities are evaluated and the decisions are made locally at the district level. Saturday consolidations are not required to undergo a rigorous standardized process that requires detailed cost analysis and multiple levels of review that leads to headquarters decision and post-implementation review, such as occurs with Area Mail Processing consolidations subject to USPS Handbook PO-101 that were the topic of Docket No. N2006-1. The district is required to notify headquarters through the area office of any Saturday consolidations. Saturday consolidations are local initiatives. There is no requirement that district managers report to headquarters that they are contemplating implementing any specific Saturday consolidations. Accordingly, it is not known which plants currently may be "under consideration" for such treatment locally, or what any associated cost savings might be. Attached is a list that identifies those plants that presently consolidate their mail on Saturday for processing at another plant:

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-22 (continued)

Saturday consolidation list

AKRON (OH) P&DC
ALBANY (GA) CSNPF
ALEXANDRIA (LA) PO
ALTOONA (PA) MPC
AMARILLO (TX) P&DC
ASHEVILLE (NC) P&DF
ASHLAND (KY) P&DF
BAKERSFIELD (CA) P&DC
BATESVILLE (AR) PO
BEAUMONT (TX) P&DC
BEND (OR)
BLOOMINGTON (IL) P&DF
BLUEFIELD (WV) MPO
BRISTOL (VA) P&DF
BROCKTON (MA) P&DF
BRYAN (TX) P&DC
BUFFALO (NY) P&DC
BURLINGTON (VT) P&DF
BUTTE (MT) MPO
CAMDEN (AR) PO
CAPE GIRARDEAU (MO) P&DF
CARBONDALE (IL) PO
CAROL STREAM (IL) P&DC
CENTRAL MASS (MA) P&DC
CENTRALIA (IL) PO
CHAMPAIGN (IL) P&DF
CHARLOTTESVILLE (VA) P&DF
CHATTANOOGA (TN) P&DC
CLOVIS (NM) PO
COLUMBUS (GA) CSNPF
DAKOTA CENTRAL (SD) P&DF
DALLAS (TX) P&DC
DAYTON (OH) P&DC
DAYTONA BEACH (FL) P&DF
DELAWARE (DE) P&DC
DULLES (VA) P&DC
DURANT (OK) PO

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-22 (continued)

EASTERN MAINE (ME) P&DF
EAU CLAIRE (WI) P&DF
EFFINGHAM (IL) PO
ERIE (PA) P&DF
EVANSVILLE (IN) P&DF
EVERETT (WA) P&DF
FLORENCE (SC) P&DF
FORT DODGE (IA) CSF
FORT LAUDERDALE (FL) P&DC
FORT SMITH (AR) MPO
FOX VALLEY (IL) P&DC
FREDERICK (MD) P&DF
GAINESVILLE (FL) P&DC
GARY (IN) P&DC
GAYLORD (MI) MPO
GRAND FORKS (ND) MPO
GREEN BAY (WI) P&DC
GRENADA (MS) P&DC
HARRISON (AR) PO
HATTIESBURG (MS) CSF
HELENA (MT) MPO
HUNTINGTON (WV) P&DF
HUNTSVILLE (AL) P&DF
HUTCHINSON (KS) MPO
INDUSTRY (CA) P&DC
JACKSON (TN) P&DC
JOHNSON CITY (TN) CSNPF
JOHNSTOWN (PA) P&DC
JONESBORO (AR) P&DC
KALAMAZOO (MI) P&DC
KALISPELL (MT) MPO
KINSTON (NC) P&DF
KOKOMO (IN) P&DF

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-22 (continued)

LAFAYETTE (IN) P&DF
LAFAYETTE (LA) P&DF
LANCASTER (PA) P&DC
LAS CRUCES (NM) PO
LIBERAL (KS) P&DC
LIMA (OH) P&DF
LINCOLN (NE) P&DF
LONDON (KY) P&DF
LUFKIN (TX) PO
LYNCHBURG (VA) P&DF
MADISON (WI) P&DC
MANKATO (MN) P&DF
MANSFIELD (OH) MPO
MARYSVILLE (CA) P&DF
MEDFORD (OR) CSNPF
MIDDLESEX-ESSEX (MA) P&DC
MID-FLORIDA (FL) P&DC
MID-HUDSON (NY) P&DC
MID-MISSOURI (MO) P&DF
MINOT (ND) MPO
MUNCIE (IN) P&DF
NNJ METRO (NJ) P&DC
NORFOLK (NE) P&DF
NORTH BAY (CA) P&DC
NORTH HOUSTON (TX) P&DC
OSHKOSH (WI) P&DF
PANAMA CITY (FL) P&DF
PASCO (WA) P&DF
PENDLETON (OR) P&DC
PLATTSBURGH (NY) CSF
POCATELLO (ID) PO
PROVO (UT) P&DF
QUINCY (IL) AMPC
RAPID CITY (SD) P&DF
READING (PA) P&DF
ROCKFORD (IL) P&DC
ROCKY MOUNT (NC) P&DF

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-22 (continued)

SAINT CLOUD (MN) P&DF
SALEM (OR) P&DF
SALINA (KS) P&DC
SAN BERNARDINO (CA) P&DC
SAN JOSE (CA) P&DC
SANTA BARBARA (CA) P&DC
SCRANTON (PA) P&DF
SIOUX CITY (IA) P&DF
SOUTH BEND (IN) P&DC
SOUTHEASTERN (PA) P&DC
SOUTHERN CT (CT) P&DC
SOUTHERN MD (MD) P&DC
SPRINGFIELD (MA) P&DC
STAMFORD (CT) P&DC
STOCKTON (CA) P&DC
TACOMA (WA) P&DC
TERRE HAUTE (IN) P&DF
TEXARKANA (TX) MPO
TRENTON (NJ) P&DC
TRUTH OR CONSEQUENCES (NM) PO
TUCSON (AZ) P&DC
TUCUMCARI (NM) PO
TWIN FALLS (ID) MHA
UTICA (NY) P&DF
WATERLOO (IA) P&DF
WENATCHEE (WA) PO
WHEELING (WV) MPO
WICHITA FALLS (TX) MP ANNEX
WILLIAMSPORT (PA) P&DF
YAKIMA (WA) PO
YOUNGSTOWN (OH) P&DF
ZANESVILLE (OH) PDF

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-23

[a] Please confirm, or explain if you are unable to confirm, that current Postal Service policy mandates that collections made from the blue collection boxes shall be as late as possible consistent with the available transportation.

[b] Please advise what the current Postal Service policy is for the maximum time that should elapse between the final collection time as shown on the blue collection box in front of the post office and the departure of the transportation from that office to the plant. Please provide any manual citations.

RESPONSE

[a] Not confirmed. Postal Service policy per the Postal Operations Manual, Section 313.1, mandates that collection service must function efficiently and collection schedules are based on the following:

- a. frequency of trips is geared to outgoing dispatches;
- b. consistent with requirements of local community and timely handling of mail at the processing point;
- c. made as near as possible to posted pick up time, but not before.
- d. continually review to make modifications justified by changed conditions.

[b] The Postal Service's objective is that generally no more than 60 minutes should elapse between final collection time and the final dispatch time. There are no current manual citations on this matter.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-24

- [a] Please confirm, or explain if you are unable to confirm, that the Postal Service provides three types of carrier delivery service, namely, city delivery, rural, and HCR.
- [b] Please confirm, or explain if you are unable to confirm, that these carriers depart from a post office with mail of all types which they deliver along their routes, pick up outgoing mail and other requests from customers along their routes, and return to their office where they clear their routes and then leave.
- [c] Please provide a listing of all of the functions that are associated with the clearing of their routes upon return to the office at the end of the day. If necessary, indicate which of the three types of carrier routes the function applies to.
- [d] Please advise which of the functions can be completed by the carrier without assistance and which of the functions require the assistance of another individual on duty at the facility.
- [e] Please provide the best estimate of the earliest time that approximately 90% of the carriers will return to the facility after completing the delivery on their route. To put it in another way, approximately 90% of the carriers will not return to their facility until on or after the time specified.

RESPONSE

[a] The Postal Service provides three types of carrier delivery service: city delivery, rural delivery and Contract Delivery Service (CDS).

[b] Not confirmed. There could be situations where the carrier does not meet these requirements, such as foot routes which do not handle parcels, routers, carriers dropping relays, parcel post routes, etc.

[c] Carrier clearance is a function of the type and amount of Special Services Mail that the carrier receives on any given day, not the type of delivery route.

Carriers return to the office and deposit collection mail and mail received from their customers for mailing in the appropriate dispatch container. They would deposit left notice parcels, and returned parcels in the appropriate container. They would place the scanner in the assigned cradle, if it is accessible to them. They would deposit any

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-24 (continued)

missent, missorted, or missequenced automation mail in the 3M case. They would then proceed to the secure accountable area or cage, or to the accountable cart if used.

There the clearance clerk would clear them of:

- Postage due items
- Customs funds/left notice items
- COD funds/left notice items
- Registered mail pieces/ signed 3849's
- Express Mail pieces/ signed labels
- Certified Mail pieces/signed 3849's
- Insured Mail signed 3849's
- Merchandise Return Service signed 3849's
- Completed Form 3811, Return Receipt

[d] The following items require the carrier to be cleared by another individual:

- Postage due items
- Customs funds/left notice items
- COD funds/left notice items
- Registered mail pieces/ signed 3849's
- Express Mail pieces/ signed labels
- Certified Mail pieces/signed 3849's
- Insured Mail signed 3849's
- Merchandise Return Service signed 3849's
- Completed Form 3811, Return Receipt

The remainder is done solely by the carrier.

[e] City carriers in a facility all generally report at approximately the same time. These routes are established at eight hours, and the carrier is expected to return to the office after approximately 7 hours and 50 minutes. Local conditions such as volume, traffic, weather, accountable mail and oversize parcels can impact and expand street time for a city carrier. In response to this inquiry, recent city carrier time records

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-24 (continued)

were reviewed which indicated 90 percent of the city carriers nationally returned by 5:22 pm.

Rural carriers report at staggered times based upon mail availability, earliest business delivery times and classification of the route, which is impacted by daily volume, number of deliveries and mileage driven. Some regular rural routes are expected to work as little as 6.5 hours per day, while others are expected to work almost ten hours per day. Therefore, rural carrier return times vary by route and by office. However, all rural carriers should plan to return to the post office by 5:00 pm daily.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-26

[a] How many post offices in the country have city delivery service?

[b] What percentage of these city delivery offices have a weekday collection time at the blue collection box in front of the main post office and all classified stations and branches of 5 PM or later?

[c] What percentage of these city delivery offices have a Saturday collection time at the blue collection box in front of the main post office and all classified stations and branches of 1 PM or later?

[d] If the response to subparts [b] and [c] is less than 100%, please provide the reasons for not providing the minimum level of service indicated in the Postal Operations Manual.

RESPONSE

[a] A total of 5,958 Post Offices provide city delivery service, among a total of 8,843 administrative offices, including stations and branches, that provide city delivery service.

[b] Due to an inability to distinguish between city delivery offices and non-city delivery offices, the Postal Service cannot provide a specific number or percentage. It is expected, based on national collection policies, that all city delivery post offices and classified stations and branches should have at least one collection box outside of the office for customer deposit of mail, and that the last collection service should be at 5:00 pm or later based on transportation.

[c] Due to an inability to distinguish between city delivery offices and non-city delivery offices, the Postal Service cannot provide a specific number or percentage. Based on the CPMS data, of 46,909 facility boxes listed, 26,262 are picked up at 1:00 pm or later on Saturday for a percentage of 56%.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

RESPONSE to DBP/USPS-26 (continued)

[d] The data do not allow for a definitive answer to the questions asked. Any failures to adhere to the national policy as stated in POM 322.23 are local in nature.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-27

[a] Please confirm, or explain if you are unable to confirm, that for purposes of the EXFC program, Saturday will be a normal day [as it presently is] if the recipient receives their mail delivery at a post office box.

[b] Please confirm, or explain if you are unable to confirm, that for purposes of the EXFC program. Saturday will not be counted as a potential delivery day if the recipient receives their mail delivery at other than a post office box.

RESPONSE

a-b) Confirmed.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-28

Under the proposed procedure if a letter is mailed in New Jersey on a Friday and is delivered to a street address in California the following Monday, how many days will that letter count towards reporting the days to delivery category? Please explain your response.

RESPONSE

If the letter is a First-Class Mail piece, it will have a 3-day service standard and a (non-holiday) Monday delivery expectation. If the piece is delivered on Monday, it will be recorded as having been delivered in 3 days, on what will happen to be the first delivery day after induction.