

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 CARLSON INTERROGATORIES DFC/USPS-18 THROUGH DFC/USPS-20  
(May 5, 2010)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas Carlson dated April 21, 2010: DFC/USPS-18 through 20. Each interrogatory is stated verbatim and is followed by the response. Objections were filed to DFC/USPS-18(b)-(c), with a partial objection to DFC/USPS-18(d), on May 3, 2010.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 5, 2010

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-18.** Please refer to the response to DFC/USPS-T4-9.

- a. Please confirm that an outbound First-Class Mail International letter mailed in San Francisco and destined to Tokyo, Japan, will be transported to the New York JFK ISC and then to Tokyo. If you do not confirm, please explain.
  
- d. Please identify the service area of each ISC.

**RESPONSE:**

- a. Confirmed.
  
- d. Given the context of questions (a)-(c), the Postal Service understands this question to ask about which domestic areas are associated with each International Service Center (ISC) with respect to outbound international mail originating in those areas. The 3-digit ZIP Code areas served by each ISC vary according to postal product and destination country. The service areas for outbound international mail are as follows:

First Class Mail International (including M-bags and International Priority Airmail)  
Letters and Flats – All Countries Except Canada

<b>From Origin Zip Codes</b>	<b>Destination Country</b>	<b>Label To</b>
005-427, 430-838, 840-847, 850-865, 870-885, 889-891, 893-898, 900-961, 970-999	All	ISC NEW YORK NY 003
967-969	All	P&DC HONOLULU HI 967

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**RESPONSE to DFC/USPS-18 (continued):**

**Small Packets – All Countries Except Canada**

<b>From Origin Zip Codes</b>	<b>Destination Country</b>	<b>Label To</b>
005, 010-139, 169-223, 226-227	All	ISC NEW YORK NY 003
006-009, 270-399, 723	All	ISC MIAMI FL 33112
140-168,224-225, 228-269,400-589, 600-699, 739	All	ISC JTW IL 60290
700-722, 724-738, 740-799, 885	All EXCEPT MEXICO	ISC JTW IL 60290
700-722, 724-738, 740-799, 885	MEXICO ONLY	ISC LOS ANGELES CA 90009
590-599, 800-838, 840-847, 850-865, 870-884, 889-891, 893-898, 900-961,970-999	All	ISC LOS ANGELES CA 90009
967-969	All	P&DC HONOLULU HI 967

**Letters and Flats – Canada**

<b>From Origin Zip Codes</b>	<b>Label To</b>
005-339, 341-342, 344, 346-347, 349-427,430-589, 600-820, 822-831, 840-847, 850-865, 870-885, 889-891, 894-898, 900-961	ISC NEW YORK NY 003
590-599, 821, 832-838, 970-999	DIS SEATTLE WA 980
967-969	P&DC HONOLULU HI 967

**Small Packets – Canada**

<b>From Origin Zip Codes</b>	<b>Label To</b>
005-139, 169-223, 226-227	ISC NEW YORK NY 003
298-339, 341, 342, 344, 346, 347, 349-399, 723	ISC MIAMI FL 33112
140-168,224-225,228-297,400-589, 600-722, 724-820, 822-831, 840-847, 870-885, 893, 898	ISC JTW IL 60290
590-599, 821, 832-838, 970-999	DIS SEATTLE WA 980
850-865, 889-891, 894-897, 900-961	ISC LOS ANGELES CA 90009
967-969	P&DC HONOLULU HI 967

**Priority Mail International**

**All Countries Except Canada**

<b>From Origin ZIP Codes</b>	<b>Destination Country</b>	<b>Label To</b>
005, 010-089, 100-129	All	FOREIGN CENTER NJ 099
006-009, 270-399, 723	All	ISC MIAMI FL 33112
130-269, 400-589, 600-699	All	ISC JTW IL 60290
700-722, 724-729	All EXCEPT MEXICO	ISC MIAMI FL 33112
700-722, 724-738, 740-799, 885	MEXICO ONLY	ISC LOS ANGELES CA 90009
730-738, 740-799, 885	All EXCEPT MEXICO	ISC JTW IL 60290
850-865, 870-884, 889-891, 900-935	All	ISC LOS ANGELES CA 90009
590-599, 800-838, 840-847, 893-898, 936-961, 970-999	All	ISC SAN FRANCISCO CA 94013
967-969	All	P&DC HONOLULU HI 967

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**RESPONSE to DFC/USPS-18 (continued):**

Canada

<b>From Origin ZIP Codes</b>	<b>Label To</b>
005, 010-089, 100-139, 169-223, 226-227	ISC NEW YORK NY 003
006-009, 298-339, 341, 342, 344, 346, 347, 349-399	ISC MIAMI FL 33112
140-168, 224-225, 228-297, 400-589, 600-820, 822-831, 840-847, 870-885, 893, 898	ISC JTW IL 60290
590-599, 821, 832-838, 970-999	DIS SEATTLE WA 980
850-865, 889-891, 900-935	ISC LOS ANGELES CA 90009
894-897, 936-961	ISC SAN FRANCISCO CA 94013
967-969	P&DC HONOLULU HI 967

Express Mail International

All Countries Except Canada

<b>From Origin Zip Codes</b>	<b>Destination Country</b>	<b>Label To</b>
005, 010-297, 400-427, 470, 471, 476, 477	All	ISC NEW YORK NY 003
006-009, 298-399, 723	All	ISC MIAMI FL 340
430-469, 472-475, 478-589, 600-699, 739	All	ISC JTW IL 60290
700-722, 724-738, 740-799, 885	All EXCEPT MEXICO	ISC JTW IL 60290
700-722, 724-738, 740-799, 885	MEXICO ONLY	ISC LOS ANGELES CA 90009
850-865, 870-884, 889-891, 900-935	All	ISC LOS ANGELES CA 90009
590-599, 800-838, 840-847, 893-898, 936-961, 970-999	All	ISC SAN FRANCISCO CA 94013
967-969	All	P&DC HONOLULU HI 967

Canada

<b>From Origin Zip Codes</b>	<b>Label To</b>
005-297, 400-427, 470, 471, 476, 477	ISC NEW YORK NY 003
298-339, 341, 342, 344, 346, 347, 349-399, 723	ISC MIAMI FL 340
430-469, 472-475, 478-589, 600-722, 724-820, 822-831, 840-847, 870-885, 893, 898	ISC JTW IL 60290
590-599, 821, 832-838, 970-999	DIS SEATTLE WA 980
850-865, 889-891, 900-935	ISC LOS ANGELES CA 90009
894-897, 936-961	ISC SAN FRANCISCO CA 94013
967-969	P&DC HONOLULU HI 967

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-19.** Please refer to the response to DFC/USPS-T4-9. If the Postal Service implements the plan that it proposes in this docket, will the New York JFK ISC continue to process outbound international mail on weekends to the same extent as it does now?

**RESPONSE:**

Processing will be consistent with operational conditions in the rest of the Postal Service network. In general, any mail arriving at the New York JFK ISC will be processed throughout the weekend, just as it is today; the plan at issue in this proceeding would not include changes in processing operations at the ISC. However, the volume of outbound international mail arriving at the ISC may be diminished as a result of operational changes in the pre-ISC stages of the Postal Service's processing network.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-20.** Please estimate the costs that could be saved if the Postal Service implemented the plan that it proposes in this docket and also did not deliver mail to post office boxes on Saturdays.

**RESPONSE:**

The Postal Service has not conducted the detailed operational analyses that would be necessary to provide an estimate of savings related to discontinuing Saturday delivery to post office boxes. Therefore, no comprehensive savings estimate is available at this time. In general, however, the Postal Service expects that this change in service would most likely enable savings in transportation between plants and associated Post Offices on Saturdays, as well as savings due to reduced air transportation. In addition, there would likely be savings in Post Office staffing. As indicated by witness Neri (USPS-T-4 at 9 and 17), there are additional costs associated with DPS sorting for letter mail going to Post Office boxes on Saturdays. The additional costs stem from the need to separate letter mail for Post Office boxes from the letter mail for street delivery. This additional cost would be saved if there were no Saturday delivery to Post Office boxes. The additional annual work hours required for clerks and mail handlers is 226,910. Applying the calculations as done by witness Colvin (USPS-T-7 at 14, Table 4), the annual cost is \$10.0 million. This, then, is the annual savings associated with not having to separate DPS letters for Post Office boxes for Saturday delivery. It should be noted that this savings estimate is limited to this particular cost element and does not indicate savings in transportation or elsewhere.