

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

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

Docket No. N2010-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORY DBP/USPS-36
(May 18, 2010)

The United States Postal Service hereby provides its responses to the above-listed interrogatories of David Popkin, dated May 4, 2010. The interrogatory is stated verbatim and is followed by the response. The Postal Service filed an objection on May 14, 2010, to interrogatory DBP/USPS-37, which was filed with DBP/USPS-36.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 18, 2010

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

DBP/USPS-36. (a) Please confirm, or explain if you are unable to confirm, that there will be transportation provided for Express Mail which enters the system on Saturday to bring this mail from the point of induction to a centralized location.

(b) What percentage of these trips will take place every Saturday (except for holidays) regardless of the volume of Express Mail inducted into the system on any given Saturday?

(c) What percentage of these trips will only be made if there are one or more Express Mail pieces inducted into the system on any given Saturday? In other words the transportation will be on an "on-call" basis.

(d) If the response to subpart (c) is greater than 0%, please explain how the system will work and how the service standards will be maintained.

(e) What percentage of these trips will be to the same centralized location that is presently utilized on a Saturday for all classes of mail?

(f) If the response to subpart (e) is greater than 0%, what percentage of those trips will transport mail other than Express Mail to the centralized location?

(g) If the response to subpart (f) is greater than 0%, please provide details on the types of other mail that will be transported and the percentage of that type of mail that will be transported presently on a Saturday.

RESPONSE

(a) Confirmed.

(b)-(c) Transportation will be aligned to ensure all Express Mail inducted into the system on any given Saturday is transported to the appropriate processing facility. As noted in response to interrogatory DFC/USPS-T3-29, "The amount of volume to be transported between a processing plant and a postal facility will determine the capacity requirement. This could necessitate more than two round-trips, or could necessitate fewer than two round-trips. In the latter case, where feasible, a multi-stop route could

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RESPONSE to DBP/USPS-36 (continued):

be constructed to stop at more than one postal facility in order to more fully utilize transportation from the associated processing plant.” Furthermore, as explained in witness Grossmann’s testimony (USPS-T-5 at 11), “[s]ome Saturday transportation will remain in place to bring mail to Post Offices for delivery and to collect Express Mail volume from Post Offices.”

The assumption is the transportation network will be aligned to support the movement of all Express Mail to the appropriate facility, based on volume. As the volume flows stabilize after implementation of the proposed change, the Postal Service could utilize an on-demand system for transportation where feasible and operationally efficient. At this juncture, the Postal Service has not established a percentage of the trips that could qualify for such a system.

(d) The system would work similarly to how it works today. If additional capacity is needed for a given origin-destination pair associated with a Highway Contract Route contract, the Postal Service will obtain extra service for that routing. If the trip is associated with Motor Vehicle Service (MVS), a MVS driver will be assigned to the trip. Service standards will be maintained by ensuring the transportation runs at the appropriate time to meet operating plan constraints.

(e) One hundred percent. Express Mail will continue to follow its current processing model and travel to the plants that are utilized for all classes of mail as they are today.

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RESPONSE to DBP/USPS-36 (continued):

(f)-(g) Under the proposed plan, the answer to (f) is theoretically “zero percent,” as only Express Mail is planned to be transported from Post Offices to associated plants on Saturdays. In practice, however, it is possible that some Post Offices may determine that it is feasible to forward some other collection mail to a plant on available transportation, even though it will not be processed at the plant on Saturday. Because this practice would be a matter of local discretion based on the circumstances, it is impossible to quantify the degree to which this could happen or the types of mail that could be affected.