

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

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

Docket No. N2010-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
REQUEST FOR ADMISSION OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-68]
(June 21, 2010)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the above-listed request for admission submitted by David B. Popkin on June 9, 2010. The request is reprinted below, with the reasons for objecting following.

DBP/USPS-68

Please refer to the response to Interrogatory DBP/USPS-26 as follows:

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%.

[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

In as much as the Postal Service is not able to provide data to respond to subparts [b] and [c] concerning the percentage of offices that have the proper weekday and Saturday collection times. In an effort to provide the Commission with an estimate of the answer, I am submitting a spreadsheet that I have prepared which is associated with an outstanding PRC Rate and Service Inquiry.

The spreadsheet shows all of the offices that are in the 453 ZIP Code area which is the Suburban Dayton, Ohio area. The columns are as follows:

Column 1 and 2 is the ZIP Code The top 9 rows require a zero be inserted

Column 3 is the post office name

Column 4 is the time of the final weekday collection

Column 5 is the time of the final Saturday collection

Column 6 is the type of delivery as noted at the end of the spreadsheet

Column 7 is the level of compliance, both mandatory and suggested, as noted

Column 8 - the word LOBBY indicates that there no outdoor blue collection box

453 ZIP CODE AREA

[OCTOBER 2009]

LAST COLLECTION TIMES AT THE POST OFFICE

ZIP CODE	CITY	MON-FRI	SAT	DELIV	IMPROVE
453	1 ALPHA	1700	1200	N	
453	2 ANNA	1600	1130	R	X
453	3 ANSONIA	1615	1200	R	X
453	4 ARCANUM	1630	1345	C	M
453	5 BELLBROOK	1645	1315	C	M
453	6 BOTKINS	1600	1200	R	X
453	7 BOWERSVILLE	1615	1115	N	
453	8 BRADFORD	1630	1230	C	M
453	9 BROOKVILLE	1700	1500	C	
453	10 BURKETTSTVILLE	1645	1115	N	
453	11 CAMDEN	1630	1200	C	M
453	12 CASSTOWN	1630	1130	R	X
453	14 CEDARVILLE	1630	1200	R	X
453	15 CLAYTON	1615	1200	R	X
453	16 CLIFTON	1630	1130	N	
453	17 CONOVER	1615	1130	R	X
453	18 COVINGTON	1615	1200	C	M
453	19 DONNELSVILLE	1630	1200	N	
453	20 EATON	1700	1215	C	M
453	21 ELDORADO	1615	1200	R	X
453	22 ENGLEWOOD	1700	1500	C	
453	23 ENON	1630	1200	C	M
453	24 FAIRBORN	1730	1630	C	
453	26 FLETCHER	1600	1200	R	X
453	27 GERMANTOWN	1645	1600	C	M
453	28 GETTYSBURG	1630	1130	N	
453	30 GRATIS	1630	1100	N	
453	31 GREENVILLE	1700	1500	C	
453	32 HOLLANSBURG	1600	1100	R	X
453	33 HOUSTON	1615	1130	R	X
453	34 JACKSON CENTER	1600	1130	R	X
453	35 JAMESTOWN	1530	1200	C	M
453	36 KETTLERSVILLE	1615	1145	N	
453	37 LAURA	1600	1130	R	X
453	38 LEWISBURG	1630	1200	R	X
453	39 LUDLOW FALLS	1615	1115	R	X
453	40 MAPLEWOOD	1600	1115	R	X
453	41 MEDWAY	1630	1200	C	M
453	42 MIAMISBURG	1700	1530	C	
453	44 NEW CARLISLE	1645	1500	C	M
453	45 NEW LEBANON	1630	1200	C	M
453	46 NEW MADISON	1615	1145	R	X
453	47 NEW PARIS	1630	1230	C	M
453	48 NEW WESTON	900	900	R	X
453	49 NORTH HAMPTON	1615	1145	N	
453	50 NORTH STAR	1645	1015	N	

LOBBY

453	51	OSGOOD	1630	1030	N		
453	52	PALESTINE	1615	1145	N		
453	53	PEMBERTON	1545	1145	N		
453	54	PHILLIPSBURG	1615	1200	N		
453	56	PIQUA	1630	1530	C	M	LOBBY
453	58	PITSBURG	1615	1030	N		
453	59	PLEASANT HILL	1645	1215	R	X	
453	60	PORT JEFFERSON	1545	1145	N		
453	61	POTSDAM	1145	1145	N		
453	62	ROSSBURG	1545	1045	R	X	
453	63	RUSSIA	1615	1200	R	X	
453	65	SIDNEY	1700	1530	C		
453	68	SOUTH CHARLESTON	1615	1145	R	X	
453	69	SOUTH VIENNA	1615	1130	R	X	
453	70	SPRING VALLEY	1545	1130	R	X	
453	71	TIPP CITY	1700	1515	C		
453	72	TREMONT CITY	1600	1200	N		
453	73	TROY	1700	1615	C		
453	77	VANDALIA	1700	1500	C		
453	78	VERONA	1630	1200	N		
453	80	VERSAILLES	1630	1300	C	M	
453	81	DAYTON -15 W DAYTON ST	1630	1230	C	M	
453	82	WEST MANCHESTER	1615	1115	R	X	
453	83	WEST MILTON	1630	1500	C	M	
453	84	WILBERFORCE	1630	1200	N		
453	85	XENIA	1700	1600	C		
453	87	YELLOW SPRINGS	1630	1200	C	M	
453	88	YORKSHIRE	1645	1145	R	X	
453	89	CHRISTIANSBURG	1615	1145	N		

DELIV

C = CITY DELIVERY

R = RURAL AND/OR HCR DELIVERY

N = BOX DELIVERY ONLY

IMPROVE

M = MANDATORY FOR CITY DELIVERY OF 5 PM MON-FRI AND 1 PM SATURDAY

X = SUGGESTED FOR AN OFFICE WITH RURAL/HCR DELIVERY BEFORE 1 PM

WHICH WOULD NOT ALLOW FOR DISPATCH OF CARRIER COLLECTED MAIL

This request for admission asks the Postal Service to review a sheet prepared by Mr. Popkin, which he says provides the last collection times at seventy-five post offices in the 453 3-digit zip area near Dayton, Ohio (but not including downtown Dayton). He apparently wants to introduce this sheet into evidence in an attempt to “estimate” the “percentage of offices that have the proper weekday and Saturday collection times.”

The information on this sheet is irrelevant to this docket. This docket concerns a Postal Service plan to eliminate or reduce certain operations, including collections from collection boxes along delivery routes on Saturdays.

Even if last collection times at post offices were relevant in general, the times in one 3-digit zip-code, out of hundreds, are not. There is no basis for concluding that the 435 zip-code is representative of the country, especially where the issue raised by Mr. Popkin concerns post offices that offer city delivery.

In addition, the Postal Service estimates that it would take at least ten hours to verify the information provided by Mr. Popkin. Given the lack of relevance of this information, that amount of time would impose an undue burden on the Postal Service.

Therefore, the Postal Service objects to this request for admission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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