

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-1 THROUGH 11**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated December 13, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 20, 2011

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

DBP/USPS-1 Various references have been made in this proceeding to a time of day with a numerical value of 12 or 12:00.

- [a] Does 12 AM / 12:00 AM refer to noon or midnight?
- [b] Does 12 PM / 12:00 PM refer to noon or midnight?
- [c] Does 12 midnight have the day associated with it of the same as one minute earlier [11:59 PM] or one minute later [12:01 AM]?
- [d] Have the above standards been followed consistently in this Docket?

RESPONSE

- (a) Midnight.
- (b) Noon.
- (c) Later.
- (d) That is possible. The objective has been to communicate with sufficient consistency to achieve clarity.

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

DBP/USPS-2

- [a] Before the implementation of this Docket, please indicate the percentage of First-Class Mail that is destined for overnight delivery, for 2-day delivery, for 3-day delivery, for 4- or more day delivery?
- [b] Provide the similar data for the expected percentages that will exist after the implementation of this Docket.

RESPONSE

- (a) See the table below.

Before Implementation	
FCM SVC STD	% of Volume
1	41.2%
2	26.7%
3	31.9%
4-5	0.3%

- (b) The actual service changes cannot be known until the final service standard regulation business rule changes are adopted and all of the Area Mail Processing operational consolidations associated with the initiative under review in this docket are determined. Assuming the illustrative changes depicted in USPS Library Reference N2021-1/8, one could hypothesize the results depicted below:

After Proposed Implementation	
FCM SVC STD	% of Volume
2 ¹	50.2%
3	49.5%
4-5	0.3%

¹ Although part of this volume is overnight, there is no basis for estimating percentage. See the response to DBP/USPS-3.

As discussed in USPS-T-1, it cannot be overemphasized that the degree to which service standards will actually change depends upon (a) the outcome of each AMP study, (b) what amendments to 39 C.F.R. Part 121 result from the market dominant product service standard rulemaking, and (c) any further

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RESPONSE to DBP/USPS-2 (continued)

modifications that result from consideration of the advisory opinion issued at the conclusion of this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-3

- [a] For First-Class Mail, what percentage of the mail currently destined for overnight delivery will change to 2- or more day delivery?
- [b] Will any First-Class Mail currently destined for overnight delivery change to 3- or more day delivery?
- [c] If so, please identify the ZIP Code pairs that will change from overnight to 3- or more day delivery.

RESPONSE

- (a) The degree to which First-Class Mail presort customers take advantage of the early entry time option to achieve overnight delivery is unknown. So is the proportion of Caller Service volume obtained by recipients at destinating plants during processing that consists of mail entered the day before. These factors ultimately will determine the percentage of mail currently receiving overnight delivery that will continue to receive it in the future. If one assumes an environment in which no presort customers take advantage of this early entry time for overnight service and no Caller Service customer picks up mail volume during the day, then one can assume that 100 percent of First-Class Mail volume will be subject to either a 2-day or 3-day delivery standard.

- (b) Utilizing the illustrative potential changes depicted in USPS Library Reference N2012-1/8, the following results are conceivable: 821 3-digit ZIP Code pairs could move from overnight to 3-day. The volume constitutes 0.57% of total First-Class Mail volume. As discussed in USPS-T-1, the degree to which service standards will actual change depends upon (a) the outcome of each AMP study, (b) what amendments to 39 C.F.R. Part 121 result from the market dominant product service standard rulemaking, and (c) any further modifications that result from consideration of the advisory opinion issued at the conclusion of this docket.

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TO INTERROGATORY OF DAVID POPKIN**

RESPONSE to DBP/USPS-3 (continued)

(c) See the origin-destination 3-digit ZIP Code combinations listed below that could potentially go from 1-day to 3-day.

OZIP	DZIP
163	167
164	167
165	167
167	152
167	161
167	163
167	164
167	165
184	137
184	138
184	139
185	137
185	138
185	139
186	137
186	138
186	139
187	137
187	138
187	139
188	137
188	138
188	139
215	212
215	217
215	254
215	262
215	263
215	264
240	229
240	232
240	242
240	244
240	246
240	247
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243	229
243	232
243	242

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TO INTERROGATORY OF DAVID POPKIN**

243	244
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243	248
245	229
245	232
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246	240
246	241
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249	245
250	265
251	265
252	265
253	265
254	267
255	265
256	265
257	265
258	265
259	265
261	150
261	151
261	152
261	153
261	154
261	215
261	260
261	265
261	267
262	150
262	151
262	152
262	153
262	154
262	215
262	260
262	265
262	267

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

263	150
263	151
263	152
263	153
263	154
263	215
263	260
263	265
263	267
264	150
264	151
264	152
264	153
264	154
264	215
264	260
264	265
264	267
265	253
265	261
265	262
265	263
265	264
266	265
267	212
267	217
267	254
267	262
267	263
267	264
268	262
268	263
268	264
287	286
288	286
289	286
290	308
290	309
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292	308
292	309
294	313
294	314
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304	314
307	372
308	290
308	291

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

308	292
308	298
309	290
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309	292
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310	317
310	318
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310	398
312	317
312	318
312	319
312	398
313	299
313	304
314	299
314	304
317	310
317	312
318	300
318	301
318	302
318	303
318	305
318	306
318	309
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318	311
318	312
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318	398
318	399
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319	301
319	302
319	303
319	305
319	306
319	309
319	310
319	311
319	312
319	317
319	398
319	399
320	344
322	344
326	344
344	320
344	322
344	323
344	326
369	394
373	372

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

374	372
388	397
389	375
389	380
389	381
389	386
389	723
390	394
391	394
392	394
393	394
394	392
395	392
396	394
397	388
398	310
398	312
400	450
400	451
400	452
400	459
401	450
401	451
401	452
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402	450
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403	407
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403	411
403	412
403	425
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403	451
403	452
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404	425
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404	450
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405	411

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

405	412
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407	452
407	459
407	470
407	471
408	400
408	401
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408	452

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

408	459
408	470
408	471
409	400
409	401
409	402
409	403
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409	410
409	411
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409	415
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409	470
409	471
410	432
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410	452
410	454
410	459
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411	418
411	430
411	431
411	432
411	456
412	403
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412	405
412	406
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412	414
412	417
412	418
412	430
412	431
412	432
412	456
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413	408

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

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415	430
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415	456
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416	456
417	400
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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TO INTERROGATORY OF DAVID POPKIN**

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427	459
430	261
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433	261
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456	261
457	261
458	434
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

458	436
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475	478
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510	560
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513	560
526	623
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

565	564
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567	566
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574	576
574	584
575	576
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TO INTERROGATORY OF DAVID POPKIN**

598	596
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614	623
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616	623
623	614
624	628
628	624
634	614
635	614
664	669
664	672
664	674
665	669
665	672
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TO INTERROGATORY OF DAVID POPKIN**

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678	739
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679	790
679	791
688	691
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691	689
692	686
692	687
729	749
739	678
739	679
756	750
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756	752
756	753
756	754
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759	753
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768	769
768	795
768	796
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796	768
811	813

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TO INTERROGATORY OF DAVID POPKIN**

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813	815
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815	813
816	813
820	828
821	594
821	596
821	597
822	828
823	828
823	829
823	830
823	831
824	828
825	828
826	828
827	828
828	820
828	822
828	823
828	824
828	825
828	826
828	827
829	823
830	823
831	823
845	846
845	847
846	845
846	847
847	845
847	846
882	883
883	882
932	936
932	937
932	938
933	936
933	937
933	938
935	936
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960	955
960	975
960	976
978	993
993	978

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

DBP/USPS-4

- [a] Please confirm, or explain if you are unable to confirm, that currently the criteria for First-Class Mail the 2-day vs. 3-day delivery for the continental 48 states is that 2-day delivery will be where the calculated drive time from the originating plant to the destinating ADC is 12 hours or less and for 3-day delivery is 12.05 hours or more [that is beyond the currently overnight area].
- [b] Please advise the 2-day vs 3-day criteria that are being proposed in this Docket.

RESPONSE

- (a) Confirmed.
- (b) See USPS Library Reference N2012-1/7.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-5 Please advise the changes that are being proposed for First-Class Mail to, from, or within Alaska, Hawaii, Puerto Rico, US Virgin Islands, Guam, American Samoa, and the other Pacific areas in the 969 ZIP Code.

RESPONSE

See USPS Library References N2012-1/7 and N2012-1/8.

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DBP/USPS-6

- [a] Please advise what changes are being proposed for delivery standards for Priority Mail since the changes in First-Class Mail being proposed in this Docket will transition mail to Priority Mail particularly in the overnight area.
- [b] Same as subpart [a] for Express Mail.
- [c] Please provide timelines for the processing of this mail to achieve the delivery standards.

RESPONSE

- (a) No changes are being proposed to the service standard day range for Priority Mail.
- (b) No changes are being proposed to the service standard day range for Express Mail.
- (c) It is important to note every facility has its own operating plan which defines its critical entry times and critical cut-off times for mail processing. The scenarios below provide a general framework under which these operations are performed.

The processing of Priority Mail generally takes place within the following times to achieve overnight delivery of this mail within a local service area: Outgoing operations typically occur between 5:00pm and 12:00am. Destinating operations typically occur between 10:00pm and 04:00am.

The processing of Express mail in general takes place within the following times to achieve overnight delivery of this mail within a large proportion of the country: Outgoing processing will occur typically between 6:00pm and 10:30pm, with enough time to make the tender time at the FedEx origin airstop, the average tender time at the origin FedEx airstop is between 9:00pm and 11:00pm. Express Mail begins departing the Memphis hub at approximately 4:00am for transport to the destination airstop. The farther from the hub the location is, the later the Postal Service pickup time. In general, the Postal Service's pickup time ranges from 6:30am to 09:00am. The Postal Service will transport this mail to a processing location for the 5-digit ZIP Code breakdown to the delivery units.

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DBP/USPS-7

- [a] Please advise any changes that have been made in the EXFC program in the last seven years.
- [b] Please advise any changes in the EXFC program that are presently being considered.
- [c] Are there any plans being made to discontinue or reduce the EXFC program and if so, please explain?

RESPONSE

- (a-c) The history of EXFC changes over the years is a matter beyond the scope of this service change docket. Parties interested in material changes to EXFC resulting from the enactment of 39 U.S.C. § 3691 are free to review the pleadings filed by the Postal Service in Docket No. PI2008-1. If a determination is made to change First-Class Mail service standards as a result of the rulemaking running concurrently with this docket, the EXFC measurement system will be examined to determine whether changes in the manner in which it collects and reports data are necessary. The Postal Service has an obligation to maintain some form of First-Class Mail measurement to satisfy its section 3691 obligation. It is not relevant to this docket whether that obligation will always be fulfilled via some form of EXFC or another measurement system, or whether any postal employee is contemplating proposing that plans be adopted to discontinue, reduce or replace EXFC in some manner in the future.

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DBP/USPS-8

- [a] For the initial processing of mail arriving at a processing center, please advise the time frame under the present scenario vs. under the proposed scenario. If this is different for different categories of mail, please explain and provide data for each.
- [b] Under the present and proposed scenarios for the initial processing of mail at a processing center, please provide the percentage of the total volume is being processed in each hour of the operation [for example if the time frame is 5 PM to 10 PM there will be five one-hour slots and each will have a percent associated with it and all five percentages will add up to 100%].

RESPONSE

(a&b) See USPS-T-1 and USPS-T-4 for discussion of current operating time frames, particularly Figure 5 at page 13 of USPS-T-4. Please see USPS-T-1, USPS-T-3 and USPS-T-4 for discussion of the time frames for the proposed scenario. The information provided below provides a general sense of the percentage of volume sorted by hour within the initial process step, utilizing cancellation as a proxy.

Present:

11:00-12:00	0%
12:00-13:00	0%
13:00-14:00	0%
14:00-15:00	1%
15:00-16:00	3%
16:00-17:00	8%
17:00-18:00	14%
18:00-19:00	17%
19:00-20:00	22%
20:00-21:00	19%
21:00-22:00	11%
22:00-23:00	4%
23:00-24:00	1%
24:00-01:00	0%
01:00-02:00	0%
02:00-03:00	0%
03:00-04:00	0%
04:00-05:00	0%
05:00-06:00	0%
06:00-07:00	0%
07:00-08:00	0%
08:00-09:00	0%
09:00-10:00	0%
10:00-11:00	0%

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Potential:

11:00-12:00	0%
12:00-13:00	0%
13:00-14:00	0%
14:00-15:00	0%
15:00-16:00	0%
16:00-17:00	0%
17:00-18:00	21%
18:00-19:00	21%
19:00-20:00	21%
20:00-21:00	21%
21:00-22:00	16%
22:00-23:00	1%
23:00-24:00	1%
24:00-01:00	0%
01:00-02:00	0%
02:00-03:00	0%
03:00-04:00	0%
04:00-05:00	0%
05:00-06:00	0%
06:00-07:00	0%
07:00-08:00	0%
08:00-09:00	0%
09:00-10:00	0%
10:00-11:00	0%

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-9

- [a] Please discuss the abilities that will exist, if any, to achieve next day delivery of First-Class Mail including, but not limited to, dropping off presorted mail at a destinating processing center prior to 8 AM.
- [b] Will it be possible to drop off mail at a local retail window and/or local lobby drop and/or a local blue collection box and have it manually processed for delivery on or before the next day and if not, why not?

RESPONSE

- (a) See USPS Library Reference N2012-1/7 for a discussion of the business rules associated with the First-Class Mail service standard change proposal.
- (b) Such activity is not beyond the realm of possibility, but it would be inconsistent with the general operating plans that will be adopted for purposes of operating the future network under the proposed service standards. The Postal Service plans to collect mail volumes from local offices, transport it to the plants and work the volumes in an automated fashion utilizing the operating parameters described in the testimony of witnesses Williams (USPS-T-1), Neri (USPS-T-4), Rosenberg (USPS-T-3) and Martin (USPS-T-6). The proposed service standards and related operating plan does not include an overnight delivery expectation for single-piece First-Class Mail.

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

DBP/USPS-10 Please provide a listing of those city delivery offices that do not have a 5 PM or later collection time on weekdays at the main office and classified stations or branches at both the lobby and blue collection box at the facility. This listing should include the following data:

- [1] Facility name, state, and ZIP Code;
- [2] Final weekday collection time in the lobby;
- [3] Final weekday collection time at the blue collection box at the facility;
- [4] The time of the final dispatch from that facility to the processing center or to another facility for dispatch to the processing center;
- [5] Whether the District Manager has granted a waiver of the 5 PM time.

RESPONSE

Information responsive to subparts (1) through (4) of this interrogatory are being filed in the form of USPS Library Reference N2012-1/39. Subpart (5) appears to presume a 5:00pm requirement (apparently subject to waiver) associated with a particular postal operation, but the interrogatory does not identify the operation to which it claims the 5:00pm requirement applies. Please specify the operation and other additional information that would permit the Postal Service to respond to this question, such as a reference or citation to the requirement and waiver policy.

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

DBP/USPS-11 Please provide a listing of all conditions under which mail which is collected by a city delivery carrier, a rural delivery carrier, or an HCR delivery carrier from customers along their route on a given day [both weekdays and Saturdays] will not be dispatched to the processing center for processing with a Day-0 of the same day as the day the carrier collected the mail from the customer.

RESPONSE

Those conditions include the ones provided in the Docket No. N2010-1

responses to the following interrogatories: DBP/USPS-24 and 30.