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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE STANDARD CHANGES, 2012 DOCKET NO. N2012-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-34 through 44]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

February 9, 2012 Respectfully submitted,

N20121F34

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-34 The following Interrogatory refers to the Statement of Work for the TTMS/EXFC dated December 26, 2008, as provided in response to my Interrogatory DBP/USPS-21.

[a] The third sentence of the first paragraph in Section 2.2.3.3 on Page 9 allows the dropper to induct mail prior to the induction date if the CPMS listing shows a last pickup time which is later than the last pickup time shown on the label on the blue collection box. Please provide an example of what this sentence means by giving the scenario that would take place indicating the time that might appear on the collection box and the time that might appear on the CPMS listing and using days of the week assuming that no holidays are involved.

[b] The final sentence of the same paragraph indicates that the supplier may change the induction date under this scenario to the next date. Please incorporate the

conditions under which this would take place using the days of the week and the conditions requested in subpart [a] above.

[c] Section 2.2.5.1.2 on Page 12 seems to be identical to the above referenced section. Please confirm or explain.

[d] What information and/or restrictions are provided to the dropper as to the location of the collection point and time window that may be utilized for a given mailing. Please indicate the source of the data and confirm or explain that the data appearing on the blue collection box label will not be known until the dropper arrives at the box.

[e] Assume that the CPMS shows a final weekday collection time of 3 PM and the label on the blue collection box shows a final weekday collection time of 2 PM. What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM [2] 2:10 PM

[f] Assume that the CPMS shows a final weekday collection time of 2 PM and the label on the blue collection box shows a final weekday collection time of 3 PM. What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM [2] 2:10 PM

[g] Please confirm or explain that a number of the collection points are scheduled for more than one collection time on a given day. What are the guidelines, if any, that exist in utilizing a collection point that has multiple collection times or can the dropper choose any drop time between 5 AM and 30 minutes prior to the final collection time?

[h] Please confirm or explain that a number of the collection points are scheduled for a weekday final collection time of later than 6:30 PM and that these boxes should also have a collection time shortly after 5 PM [POM Section 322.341]. What are the

guidelines, if any, that exist in utilizing a collection point that has a weekday collection time of 6:30 PM or later?

[i] If the response to subparts [g] and/or [h] above indicate that there are no guidelines for either or both of these two scenarios, please confirm or explain that the on-time results would be skewed in favor of the Postal Service in subpart [g] since there would be two or more opportunities to collect the mail and skewed against the Postal Service in subpart [h] since the mail would arrive at the plant later than with a 5 PM or earlier collection.

[j] Please advise the guidelines, if any, that exist to take into account each of the following characteristics to ensure that the results are representative of the conditions that exist in the overall mail profile:

[1] Early collection times vs. late collection times

[2] Early arrival time at the plant vs. late arrival time at the plant

[3] Multiple collection times vs. a single collection time

[4] Using an early vs. late collection at a box with multiple collections

DBP/USPS-35 [a] Please advise the approximate number of EXFC droppers and reporters that are presently being utilized.

[b] For reporters, what is the approximate percentage breakdown between those that receive mail delivery at a post office box vs. those that receive delivery at a residence address vs. delivery at a business address?

DBP/USPS-36 Please provide a file in Microsoft Access file that will show the machine number [a four digit number with leading zeros if necessary], present locations of mail processing machines with the following data columns:

Mach_num

Site

mach_type

DBP/USPS-37 Please refer to your response to Interrogatory DBP/USPS-33. That Interrogatory failed to indicate that First-Class Mail was considering single piece and not presorted First-Class Mail.

Please confirm, or explain if you are unable to confirm, each of the following statements:

[a] There are a number of ZIP Code pairs that presently have overnight service standards for single piece First-Class Mail.

[b] All of these ZIP Code pairs will convert to either 2-day or 3-day service standards for single-piece First-Class Mail.

[c] This conversion to 2-day and 3-day service standards represents a reduction in service.

[d] The price for single piece First-Class Mail will remain the same immediately before and after the conversion noted in subpart [b] above.

[e] A reduction in service while maintaining the same price could be considered by many mailers to represent a price increase in the same manner that exists in the grocery business where ice cream makers reduced the size of the half gallon [two quarts] container to 1.5 quarts and kept the sales price the same.

[f] A similar condition would also exist in single piece First-Class Mail which is converted from a 2-day service standard to a 3-day service standard.

[g] Please advise all of the ZIP Code pairs that presently have overnight service standards for single piece First-Class Mail and which will convert to a 2-day or 3-day service standard and which will have a service standard for Priority Mail or Express Mail that is 2-days or more.

[h] Please advise all of the ZIP Code pairs that presently have 2-day service standards for single piece First-Class Mail and which will convert to a 3-day service standard and which will have a service standard for Priority Mail or Express Mail that is 3-days or more.

[i] Based on the response to subparts [g] and [h] above, please confirm or explain that mailers who have a need to obtain the service standard that presently exists for single piece First-Class Mail that is being converted to a slower service in the present

Docket, will still be able to obtain the current delivery standard by sending their mail as Priority Mail or Express Mail.

[j] Please confirm that Priority Mail and Express Mail have always had a higher price than single piece First-Class Mail and there is no reason to expect that condition to change.

DBP/USPS-38 Please refer to your response to Interrogatory DBP/USPS-32.

[a] Should the Northern New Jersey Metro P&DC consolidate its operation to the DVD P&DC as proposed, will it now be necessary to bring my Presorted Standard Mail or any other class of mail that has a discount or service advantage for SCF deposit to the DVD P&DC rather than the NNJ Metro P&DC if I want to receive the SCF destination rate for mail that presently receives the SCF destination rate by bringing it to the NNJ Metro P&DC?

[b] Will any of the proposed consolidations throughout the country maintain their BMEU and/or destination drop off capability so as not to require additional travel?

[c] If so, why isn't this capability being utilized at the NNJ Metro P&DC?

DBP/USPS-39 Please refer to your response to Interrogatory DBP/USPS-31 subpart [c]. Please advise why the Postal Service presently does not require this type of notification and why it believes it is appropriate to not require it in the future.

DBP/USPS-40 Please refer to your response to Interrogatory DBP/USPS-30.

[a] Prior to the consolidation of BMEUs to 40 locations in New Jersey, approximately how many locations in New Jersey permitted the entry of the various categories of bulk mail?

[b] Prior to the consolidation of BMEUs to 1000 locations in the other 49 states, approximately how many locations in these 49 states permitted the entry of the various categories of bulk mail?

[c] Which ever list is shorter, please advise which of the 49 other states either experienced a consolidation of BMEUs or did not experience a consolidation of BMEUs and still permit the deposit of such mail at all facilities in the state?

[d] Over what time frame did these consolidations take place?

DBP/USPS-41 Please refer to your response to Interrogatory DBP/USPS-26.

[a] With the exception of ZIP Code pairs that cross a time zone line, will the given service standard for single piece First-Class Mail in the 48 contiguous states in the A to B direction have the same service standard in the B to A direction?

[b] If not, please provide the exceptions that would exist along with the reasons.

[c] Please explain how the crossing of a time zone line will affect the 4-hour drive time rule for determining the service standard.

[d] Since the only dividing time between service standard changes is the 4-hour rule, please confirm that ZIP Code pairs that cross a time zone line will have an effect only for physical drive times of between 3 and 5 hours.

[e] What happens to the service standards when a change is made to or from Daylight Savings Time and that either introduces or eliminates a time zone line between the two plants?

DBP/USPS-42 Please provide information on how the drive time is determined between two processing plants in order to apply the 4-hour rule? What changes, if any, have been made to the procedure used in the determination of the 12-hour drive time in a previous Docket for the 2-day vs. 3-day service standard?

DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-28 subpart [a].

If the mail volume has gone down since 2006 and the processing network has pretty much stayed the same, why isn't the response an unequivocal yes to still being valid today?

DBP/USPS-44 Please refer to your response to Interrogatory DBP/USPS-29. At this point in time, have any changes in Part 3 of the Postal Operations Manual been considered or discussed as a result of the potential implementation of the proposed

Docket? For example, one of the requirements of Part 3 of the POM is to have a weekday final collection of 5 PM or later at all city delivery offices. If the Postal Service has considered changing this to 4 PM or later, it would have an effect on the pending Docket and therefore be a relevant request.