

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE NOTICE OF ERRATA IN  
OPPOSITION TO DAVID POPKIN MOTION TO COMPEL A RESPONSE TO  
INTERROGATORY DBP/USPS-30  
(March 17, 2006) [ERRATA]

The United States Postal Service hereby files this notice correcting several errata in its March 16, 2006, opposition to the motion of David Popkin seeking to compel a response to interrogatory DBP/USPS-30.

<u>Page</u>	<u>Line</u>	<u>Change</u>
2	2	“Standard Mail” to “Package Services”
	6	“Package Services” to “Standard Mail”
3	3	“Mai” to “Mail”

Corrected copies of pages 2 and 3 of the March 16<sup>th</sup> opposition are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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As indicated in the Postal Service's February 22, 2006, response to interrogatory DBP/USPS-11, for Package Services, there are no service standards applicable to the most remote 3-digit ZIP Code areas in the postal system, which are located in Alaska, Hawaii, and other offshore destinations. Otherwise, there are service standards for mail originating and/or destinating to these remote ZIP Code areas for First-Class Mail, Periodicals, and Standard Mail. The geographic scope of applicable service standards is a matter relevant to the request in this proceeding. Accordingly, the Postal Service was responsive to DBP/USPS-11.

Using several different data collection systems, the Postal Service, to varying degrees, systematically collects service performance and/or time-in-transit data for Express Mail, Priority Mail, First-Class Mail and Package Services, but not for Periodicals and Standard Mail. There are approximately 850,000 3-digit ZIP Code pairs from which such data may be drawn. In interrogatory DBP/USPS-30, Mr. Popkin focuses on a miniscule number of the most geographically remote ZIP Codes in the postal system and inquiries about the on-time service performance scores for Periodicals, Standard Mail and Package Services. Such data may be interesting to Mr. Popkin. However, none of its is relevant to or has any material bearing on the question of whether it would conform to the policies of the Postal Reorganization Act for the Postal Service, on what could be a substantially nationwide basis, to implement changes in the application of current service standards as a consequence of a systemwide program of mail processing and transportation consolidation.

In his March 7, 2006, motion to compel, Mr. Popkin offers no explanation of how the requested information is related to any material issue in this docket. Instead, at

pages 4, he expresses a reaction to the long-established fact, confirmed in response to interrogatory DBP/USPS-11, that the Postal Service has service standards for Periodicals and Standard Mail to the above-referenced remote ZIP Codes destinations, but no similar service standards for Package Services. He then references the fact that, in lieu of non-existent service standard information for Package Services mail destined for Alaska from New Jersey, for example, the Postal Service offers estimated transit times for Automated Postal Center users.<sup>1</sup> From there he leaps to the accusation that the Postal Service has provided “false and misleading information as it relates to Periodicals and Standard Mail sent to, from, or within Alaska, Hawaii, and offshore destinations.” Popkin Motion at 4-5.

Not stopping there, Mr. Popkin continues by declaring that:

If the Postal Service provides these service standards and appears to imply that it is never achieved, they should remove that testimony from their case. Otherwise, they should provide the response to indicate that there is some validity to these service standards.

*Id.* at 5. It is unclear to the Postal Service exactly which information provided in response to DBP/USPS-11 or elsewhere is alleged to be false and/or misleading. As acknowledged by its response to DBP/USPS-11, the Postal Service has service standards for Periodicals and Standard Mail that apply to the remote locations identified by Mr. Popkin, but no such service standards for Package Services.

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<sup>1</sup> The Postal Service confirms, for example, that when prompted, a postal lobby APC will give an estimate of 35 days for delivery of Package Services mail from the 3-digit ZIP Code area 202 to the 969 3-digit ZIP Code area, representing the outer range of the postal retail window POS terminal indication that “3 - 5 weeks” should be allowed for such delivery. Consistent with this information, users of the Postage Rate Calculator function at [www.usps.com](http://www.usps.com) are informed that the Postal Service is “Unable to determine” the speed with which packages with the same origin-destination pattern can be expected to arrive.