

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN  
(DBP/USPS-8) [ERRATA]  
(April 24, 2006)

The United States Postal Service hereby submits its revised response to the following interrogatory of David Popkin: DBP/USPS-8. The original response was filed on February 22, 2006. The revised response to DBP/USPS-8 filed today supersedes the original response. The interrogatory is stated verbatim and followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

**Revised: April 24, 2006**

**DBP/USPS-8**

Please refer to the page 3 of the attachment to Witness Shah's testimony as it relates to Priority Mail. Please explain why it was necessary to include the word "usually" in the last sentence and provide a listing of those ZIP Code pairs where the Priority Mail are slower than those for First-Class Mail.

**RESPONSE**

The word "usually" was used because, in a matrix of approximately 850,000 3-digit ZIP Code pairs, anomalies or database errors not known to the persons responsible for managing the service standard database could exist, cautioning against the unequivocal use of the terms "always" and "never." No such pairs are known to exist. In contrast, see the response to DBP/USPS-10.

The original response to this interrogatory was prepared with domestic (non-military) origin-destination 3-digit ZIP Code pairs in mind. There are 108 3-digit origin-destination pairs that involve military 3-digit ZIP Codes for which the First-Class Mail service standard is one day and the Priority Mail standard is two days.

The destinating service standards for these military pairs are exceptions to the *"Priority should be equal to or faster than First-Class Mail"* rule because domestic ZIP Codes are tied to a consistent, physical, geographical location in the postal network. In contrast, military ZIP Codes can be assigned *anywhere* the mail is decided to be worked in the network, and the destinating ZIPs are not tied to a

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**RESPONSE to DBP/USPS-8 (continued):**

specific geographical location. In the case of military Priority Mail, the processing for the 090-098 series ZIPs is performed at the AMC in Newark, NJ for mail originating on the East Coast. For First-Class Mail, the processing for 090-098 is performed at JFK in NY, not the Newark AMC. Since service standards for military mail are calculated from the point of deposit to the gateway city where the final domestic processing is performed, the destinating 090-098 standards are not necessarily the same when different cities are involved. In this case, because Newark and JFK have different overnight areas, there are 108 military service standard pairs in First-Class Mail that are *faster* than their Priority counterparts, as reflected in the Attachment.

Similarly, Priority Mail deposited in origin ZIPs in the Great Lakes Area; Eastern Area origin ZIPs 400-409, 411-429, 471, 476, 477; Western Area origin ZIPs 500-529, 540, 546-548, 550-599, 612, 636-649, 654-699, 739, 800-831, 835, 838, 970-978, 980-999; and Pacific Area origin ZIPs 967-969, all send their Priority Mail for ZIP Codes 090, 091, 092 and 094 into the J.T. Wecker facility in Chicago. Priority Mail to the remainder of the country for those same military ZIPs sends goes to the AMC at Newark, NJ. While this circumstance does not produce FCM standards that are *faster* than Priority, it still should be noted for the record, because on the Service Standard Maps in USPS Library

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Reference N2006-1/2, one will note destinating overnight areas in both the Chicago and Newark areas for Priority mail for ZIP Codes 090, 091, 092 and 094, for the reasons outlined above.

**Military ZIP Code Pairs wherein the First-Class Mail Service Standard "appears" to be faster than the Priority Standard (but the Military Priority Mail is actually worked in a different city)**

Origin ZIP	Origin Name	Destination ZIP	Destination Name	Standard for PRI	Standard for FCM
100	NEW YORK	090	MILITARY	02	01
100	NEW YORK	091	MILITARY	02	01
100	NEW YORK	092	MILITARY	02	01
100	NEW YORK	093	MILITARY	02	01
100	NEW YORK	094	MILITARY	02	01
100	NEW YORK	095	MILITARY	02	01
100	NEW YORK	096	MILITARY	02	01
100	NEW YORK	097	MILITARY	02	01
100	NEW YORK	098	MILITARY	02	01
101	NEW YORK	090	MILITARY	02	01
101	NEW YORK	091	MILITARY	02	01
101	NEW YORK	092	MILITARY	02	01
101	NEW YORK	093	MILITARY	02	01
101	NEW YORK	094	MILITARY	02	01
101	NEW YORK	095	MILITARY	02	01
101	NEW YORK	096	MILITARY	02	01
101	NEW YORK	097	MILITARY	02	01
101	NEW YORK	098	MILITARY	02	01
102	NEW YORK	090	MILITARY	02	01
102	NEW YORK	091	MILITARY	02	01
102	NEW YORK	092	MILITARY	02	01
102	NEW YORK	093	MILITARY	02	01
102	NEW YORK	094	MILITARY	02	01
102	NEW YORK	095	MILITARY	02	01
102	NEW YORK	096	MILITARY	02	01
102	NEW YORK	097	MILITARY	02	01
102	NEW YORK	098	MILITARY	02	01
103	STATEN ISLAND	090	MILITARY	02	01
103	STATEN ISLAND	091	MILITARY	02	01
103	STATEN ISLAND	092	MILITARY	02	01
103	STATEN ISLAND	093	MILITARY	02	01
103	STATEN ISLAND	094	MILITARY	02	01

103	STATEN ISLAND	095	MILITARY	02	01
103	STATEN ISLAND	096	MILITARY	02	01
103	STATEN ISLAND	097	MILITARY	02	01
103	STATEN ISLAND	098	MILITARY	02	01
104	BRONX	090	MILITARY	02	01
104	BRONX	091	MILITARY	02	01
104	BRONX	092	MILITARY	02	01
104	BRONX	093	MILITARY	02	01
104	BRONX	094	MILITARY	02	01
104	BRONX	095	MILITARY	02	01
104	BRONX	096	MILITARY	02	01
104	BRONX	097	MILITARY	02	01
104	BRONX	098	MILITARY	02	01
110	QUEENS	090	MILITARY	02	01
110	QUEENS	091	MILITARY	02	01
110	QUEENS	092	MILITARY	02	01
110	QUEENS	093	MILITARY	02	01
110	QUEENS	094	MILITARY	02	01
110	QUEENS	095	MILITARY	02	01
110	QUEENS	096	MILITARY	02	01
110	QUEENS	097	MILITARY	02	01
110	QUEENS	098	MILITARY	02	01
111	LONG ISLAND CITY	090	MILITARY	02	01
111	LONG ISLAND CITY	091	MILITARY	02	01
111	LONG ISLAND CITY	092	MILITARY	02	01
111	LONG ISLAND CITY	093	MILITARY	02	01
111	LONG ISLAND CITY	094	MILITARY	02	01
111	LONG ISLAND CITY	095	MILITARY	02	01
111	LONG ISLAND CITY	096	MILITARY	02	01
111	LONG ISLAND CITY	097	MILITARY	02	01
111	LONG ISLAND CITY	098	MILITARY	02	01
112	BROOKLYN	090	MILITARY	02	01
112	BROOKLYN	091	MILITARY	02	01

112	BROOKLYN	092	MILITARY	02	01
112	BROOKLYN	093	MILITARY	02	01
112	BROOKLYN	094	MILITARY	02	01
112	BROOKLYN	095	MILITARY	02	01
112	BROOKLYN	096	MILITARY	02	01
112	BROOKLYN	097	MILITARY	02	01
112	BROOKLYN	098	MILITARY	02	01
113	FLUSHING	090	MILITARY	02	01
113	FLUSHING	091	MILITARY	02	01
113	FLUSHING	092	MILITARY	02	01
113	FLUSHING	093	MILITARY	02	01
113	FLUSHING	094	MILITARY	02	01
113	FLUSHING	095	MILITARY	02	01
113	FLUSHING	096	MILITARY	02	01
113	FLUSHING	097	MILITARY	02	01
113	FLUSHING	098	MILITARY	02	01
114	JAMAICA	090	MILITARY	02	01
114	JAMAICA	091	MILITARY	02	01
114	JAMAICA	092	MILITARY	02	01
114	JAMAICA	093	MILITARY	02	01
114	JAMAICA	094	MILITARY	02	01
114	JAMAICA	095	MILITARY	02	01
114	JAMAICA	096	MILITARY	02	01
114	JAMAICA	097	MILITARY	02	01
114	JAMAICA	098	MILITARY	02	01
115	WESTERN NASSAU	090	MILITARY	02	01
115	WESTERN NASSAU	091	MILITARY	02	01
115	WESTERN NASSAU	092	MILITARY	02	01
115	WESTERN NASSAU	093	MILITARY	02	01
115	WESTERN NASSAU	094	MILITARY	02	01
115	WESTERN NASSAU	095	MILITARY	02	01
115	WESTERN NASSAU	096	MILITARY	02	01
115	WESTERN NASSAU	097	MILITARY	02	01

115	WESTERN NASSAU	098	MILITARY	02	01
116	FAR ROCKAWAY	090	MILITARY	02	01
116	FAR ROCKAWAY	091	MILITARY	02	01
116	FAR ROCKAWAY	092	MILITARY	02	01
116	FAR ROCKAWAY	093	MILITARY	02	01
116	FAR ROCKAWAY	094	MILITARY	02	01
116	FAR ROCKAWAY	095	MILITARY	02	01
116	FAR ROCKAWAY	096	MILITARY	02	01
116	FAR ROCKAWAY	097	MILITARY	02	01
116	FAR ROCKAWAY	098	MILITARY	02	01

**List of Official  
Military ZIP Codes**  
(099 is a *Temporary Military*  
ZIP for the current Gulf War  
and does not have Service  
Standards assigned to it)

<b>3-Digit ZIP</b>	<b>Name</b>
090	MILITARY
091	MILITARY
092	MILITARY
093	MILITARY
094	MILITARY
095	MILITARY
096	MILITARY
097	MILITARY
098	MILITARY
340	MILITARY
962	MILITARY
963	MILITARY
964	MILITARY
965	MILITARY
966	MILITARY