

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES  
(DBP/USPS-61 AND 75)

The United States Postal Service hereby files its responses to the following interrogatories of David Popkin, dated March 24 and April 24, 2006, respectively: DBP/USPS-60 and 75. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

**DBP/USPS-61** Please refer to your response to Interrogatory DBP/USPS-48. Please provide a more comprehensive discussion of the difference between a P&DC and a P&DF. Discuss the levels of transportation and destinations served for categorizing a facility as a P&DC vs. a P&DF.

**RESPONSE**

P&DCs and P&DFs are sectional center mail processing plants that generally perform the same basic mail processing functions on a stand-alone basis.

P&DFs tend to be smaller plants than P&DCs, often employing the same equipment and processes, but with less equipment and on a smaller scale.

Levels of transportation and destinations served do not necessarily differentiate such facilities. Over time, the significance of the “C” vs. “F” designation seems to have diminished, as some P&DFs and P&DCs are virtually indistinguishable.

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

**DBP/USPS-75** Please refer to the response to Interrogatory OCA/USPS-20 subpart [b] [iv] [1]. [a] Please confirm, or explain if you are unable to confirm, that for the ten facilities shown there were no changes in any of final collection times shown on a blue collection box at any of the offices served by that facility other than the 38 boxes at Greensburg, 1 box at Waterbury, 10 boxes at Marysville, the 274 boxes at Pasadena that were changed and then changed back to the original times, and the 192 boxes at Olympia starting at the time that the study was implemented and running until the time that the response was prepared to the interrogatory. [b] Please provide the total number of boxes at the Kinston and Monmouth facilities. [c] Please provide the details of the changes that were made at the Greensburg, Waterbury, Marysville, Pasadena, and Olympia facilities including the before and after times of the boxes and the before and after times of the final dispatch of the mail from the associated post office that collected from each of the boxes. [d] Please discuss why the final collection times of the 274 Pasadena boxes were returned to the original collection time.

**RESPONSE**

- [a] Without interrogating each postal employee in each service area responsible for posting collection times on collection boxes and then checking each box in each of these service areas, the Postal Service cannot confirm that no changes were posted on any boxes other than as described in response to that interrogatory or in response to DFC/USPS-6. The Postal Service is disinclined to undertake those tasks for purposes of responding to this interrogatory. Understanding that errors can occur, there is no material issue in this proceeding that is affected by whether the Postal Service can presently confirm that every single collection box currently has the correct collection time posted. Also bear in mind that the Pasadena changes were only proposed, but were never implemented.
- [b] There are four collection boxes at the Monmouth facility and two at the Kinston facility.
- [c] The collection routes for the eight Olympia boxes referenced in response to DFC/USPS-6 start at the Olympia Main Post Office. Only one route

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**RESPONSE to DBP/USPS-75 (continued):**

returns to that facility. The Olympia MPO final DOV is not proposed to change. The only Pasadena collection box times which were changed were for boxes in front of the P&DC. They changed from 8:30pm to 7:30pm, with no associated final DOV change. Marysville moved 9 last pickup times from 5:00pm to 4:30pm, with no change to final DOV. Waterbury moved 1 box from 5:00pm to 4:00pm, with no change to final DOV. In Greenburg, the collection box pickup time changes did not involve last pickup times. They consisted of the establishment of additional times earlier than the existing last pickup times. Accordingly, the final DOV was not impacted.

[d] There was a local proposal to move the collection times for that many Pasadena boxes. The proposal was withdrawn. Therefore, the collection times were never moved up or back. Accordingly, there is no basis for explaining any move up or back.