

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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EVOLUTIONARY NETWORK DEVELOPMENT]
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-22-48]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory, however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], 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 27, 2006

Respectfully submitted,

N22061E

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

DBP/USPS-22 Appendix N of the April 2002 United States Postal Service Transformation Plan is entitled "Procedures for Closing Postal Facilities." Pages 6 through 10 relate to the "Consolidations - Implementation of Area Mail Processing Procedures." [a] Please advise whether all of the material contained on these five pages is still part of the current/proposed plan. [b] If not, please furnish details of the changes and explain the reasons for the change.

DBP/USPS-23 Please refer to your response to DBP/USPS-4. Please provide a listing of the PROPOSED service standards that would take place for each of the 41 pending AMP studies if the study indicated the proposed decision is approved as proposed.

DBP/USPS-24 Please refer to your response to DBP/USPS-7. [a] Does the listing of 295 pairs include those pairs where post offices serve more than one state such as Alta WY 83414 served by the post office at Driggs ID 83422? [b] If not, why not?

DBP/USPS-25 Please refer to your response to DBP/USPS-7. [a] Please advise the plans that the Postal Service has to bring any or all of these pairs to meet the criteria listed on page 2 of the attachment to Witness Shah's testimony, namely, that all mail sent within the same state should be either overnight or 2-day standard. [b] In those instances where there are no plans to bring the particular pair into compliance, please explain the reasons why?

DBP/USPS-26 Please refer to your response to DBP/USPS-9 subpart e. [a] Please explain how the delivery of Priority Mail to various military ZIP Codes is considered overnight when mailed from ZIP Codes in the New Jersey area [for the 090-098 area] and Chicago [for the 090-092 and 094 area]. [b] What is the service standard for First-Class Mail for each of the pairs destinating at the same military ZIP Code?

DBP/USPS-27 Please refer to your response to DBP/USPS-9 subpart e. Please explain how First-Class Mail from the 049 ZIP Code area which is processed by the Bangor P&DC will not achieve overnight delivery to the 047 ZIP Code area which is also served by the same Bangor P&DC.

DBP/USPS-28 Please refer to your response to DBP/USPS-10. Please confirm, or explain if you are unable to do so, that after the Service Standard CD ROM for PQ 3-06, the service standards for Periodicals will either be equal to or slower than the service standards for First-Class Mail.

DBP/USPS-29 Please refer to your response to DBP/USPS-11. Please explain why the Service Standards CD ROM shows delivery standards for Periodical and Standard Mail to and from Alaska, Hawaii, and other offshore destinations but does not show it for Package Services.

DBP/USPS-30 Please refer to your response to DBP/USPS-11 and 12. Please provide any reports which show the actual delivery time for Standard Mail, Periodicals, and/or Package Services mail destined to, from, or within Alaska, Hawaii, or other offshore destinations. Data should be provided for a period of at least one year.

DBP/USPS-31 Please refer to your response to DBP/USPS-13. Please clarify your response as it relates to Express Mail. [a] Is Express Mail delivered to all ZIP Codes throughout the country in 1 or 2 CALENDAR days as indicated on page 4 of the attachment to Witness Shah's Testimony? [b] If not, please provide complete details of the service standards that apply to Express Mail.

DBP/USPS-32 Please refer to your response to DBP/USPS-14. Please confirm that the response provides a listing of ALL facilities where mail processing takes place. For example, Aberdeen SD as referenced in DBP/USPS-33 does not appear to be on the list. In addition, is mail processed at the Fairbanks and Ketchikan AK post offices that also do not appear to be on the list? Please provide a complete response to the original interrogatory.

DBP/USPS-33 The attachment to Witness Williams' testimony shows that a study is being conducted with respect to the Aberdeen SD CSMPC. The website www.postalnews.com shows a newspaper article apparently from the Aberdeen American News of February 24, 2006. This article contains a discussion of a meeting held on February 23rd by Clem Felchle. [a] Please confirm, or explain if you are unable to do so, that Clem Felchle is the District Manager of the USPS Dakota District. [b] At the meeting Mr. Felchle was requested to provide a hard copy of the answers provided. If such a written response is provided to any of the meeting attendees, please provide a copy. [c] Please confirm, or explain if you are unable to do so, the statements attributed in the article to Mr. Felchle that there are approximately 20,000 pieces of mail sent from Aberdeen to Sioux Falls, that approximately 15,000 pieces of mail are sent from Sioux Falls to Aberdeen, and that approximately 355 pieces of mail are sent from Aberdeen to Jamestown ND. [d] Please provide any other mail volume numbers that were provided at the meeting and did not appear in the newspaper article. [e] Please explain why this data was released based on the statement made on first page of Library Reference N2006-1/5.

DBP/USPS-34 For each of the 11 reports contained in Library References N2006-1/5 and /6 please provide a narrative as to the changes in service standards for First-Class Mail and Priority Mail in the following format: First-Class Mail between 087 and 080-084 will change from 2-day to overnight.

DBP/USPS-35 For each of the 11 reports contained in Library References N2006-1/5 and /6 please provide a narrative as to the changes in service standards for other classes of mail that appear on the Service Standards CD ROM such as Standard Mail, Periodicals, and Package Services.

DBP/USPS-36 For each of the 11 reports contained in Library References N2006-1/5 and /6 please provide a listing of any changes that resulted between 2-day and 3-day First-Class Mail and Priority Mail.

DBP/USPS-37 With respect to the Monmouth P&DC report as shown in Library Reference N2006-1/5, [a] were there any changes in the First-Class Mail or Priority Mail for mail from the 077 area [including between 077 and 080-084]? [b] If so, what were they and why are they not in the report?

DBP/USPS-38 With respect to the Monmouth P&DC report as shown in Library Reference N2006-1/5, I notice that only Federal elected officials were advised. [a] Please explain why state and county officials were not notified. [b] Is it the policy to only notify Federal elected officials and not state or county officials? [c] If so, please explain the rationale behind this.

DBP/USPS-39 As noted in DBP/USPS-33 a meeting was apparently held with respect to the closing of the Aberdeen processing activity. [a] Is it a policy to have a meeting between postal officials and members of the community such as the Aberdeen meeting? [b] If not, why not? [c] If so, where in the eleven reports is this meeting documented? [d] What publicity was provided for the Aberdeen meeting, was the meeting open to the public, and what classes of the public were specifically invited?

DBP/USPS-40 [a] Please confirm, or explain if you are unable to confirm, that when Plant A is closed and the mail that was previously processed at that plant is now

processed at Plant B, that this could effect the ability of Plant B to effectively process the mail and maintain the level of performance, such as EXFC scores, that existed prior to the consolidation. [b] Please provide the evaluation of this effect on the service standards for each of the eleven reports contained in Library References N2006-1/5 and /6. [c] If this is not being considered, please advise why not.

DBP/USPS-41 [a] Please confirm, or explain if you are unable to confirm, that when Plant A is closed and the mail that was previously processed at that plant is now processed at Plant B, that this could increase the number of days that a plant may be stretched to complete the processing of the mail prior to the necessary cutoff that existed prior to the consolidation. [b] Please provide the evaluation of this effect on the service standards for each of the eleven reports contained in Library References N2006-1/5 and /6. [c] If this is not being considered, please advise why not.

DBP/USPS-42 [a] Please confirm, or explain if you are unable to confirm, that when Plant A is closed and the mail that was previously processed at that plant is now processed at Plant B, that this could affect the final collection and dispatch times [in general, they would become earlier due to the increased travel time] that existed at Plant A's associate offices prior to the consolidation. [b] Please provide the evaluation of this effect on the service standards for each of the eleven reports contained in Library References N2006-1/5 and /6. [c] If this is not being considered, please advise why not.

DBP/USPS-43 [a] Please confirm, or explain if you are unable to confirm, that when Plant A is closed and the mail that was previously processed at that plant is now processed at Plant B, that in general this will result in the mail being postmarked with the designation utilized at Plant B. [b] Please provide the evaluation of this effect for each of the eleven reports contained in Library References N2006-1/5 and /6. [c] If this is not being considered, please advise why not.

DBP/USPS-44 [a] With respect to consolidations and the desire of some mailers to have a local postmark, what provisions exist for mailers to obtain a local postmark? [b] How is this publicized? [c] Will the conversion in process of the postmarks from the round postmark to the straight-line inkjet postmark have an effect on the ability to provide

separate/combined names in the postmark? Please explain. [d] Please provide an updated schedule of the conversion to the straight line inkjet postmarks.

DBP/USPS-45 [a] Please discuss the entry discounts that are provided to mailers for drop shipping mail at various levels of facilities. [b] How will the consolidations affect these discounts? For example, prior to the consolidation, a mailer apparently could obtain the DSCF rate for 077 and 087 mail deposited at the Monmouth P&DC facility and after the consolidation, a mailer would have to deposit 077 mail at the Kilmer P&DC and for 087 mail at the Trenton P&DC.

DBP/USPS-46 On page 5 of Library Reference N2006-1/3 it indicates that maps would be provided. Please provide maps of the eleven reports contained in Library References N2006-1/5 and /6.

DBP/USPS-47 On chapter 5 of Library Reference N2006-1/3 it indicates that post-implementation reviews would be provided. Please provide copies of any post-implementation reviews of the eleven reports contained in Library References N2006-1/5 and /6.

DBP/USPS-48 Please refer to the response to DBP/USPS-14. [a] What do L&DC, DDC, MHA, and AMPC stand for? [b] Please discuss how an L&DC, DDC, MHA, and AMPC fit into the overall transportation process. [c] Please discuss how the difference between a P&DC and a P&DF fit into the overall transportation process. [d] Please discuss how the differences between an MPC, CSNPF, MPO and PO fit into the overall transportation process.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin February 27, 2006
