

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 INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-6 THROUGH 16)
(March 24, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of the Office of the Consumer Advocate, filed on March 8, 2006: OCA/USPS-6 through 16. The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-6

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 12, FCM Service Commitments for the Santa Clarita/Industry P&DCs.

- a. Please confirm that the positive 2,500 for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an improvement in service commitment from 2-Day to overnight service for an average daily volume of 2,500 pieces. If not, please explain the 2,500.
- b. Please confirm that the negative 2500 for 2- Day/3-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from 2-Day service to 3-Day service for an average daily volume of 2,500 pieces. If not, please explain what is meant by the negative 2,500 for the 2-Day/3-Day change.

RESPONSE

- a. Confirmed
- b. It is not a downgrade of 2500 pieces, but an indication that 2500 pieces are being moved from 2-day to overnight.

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OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-7

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 74, FCM Service Commitments for the Stamford P&DC.

- a. Please confirm that the (4,087) for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from Overnight to 2-Day service for an average daily volume of 4,087 pieces. If not, please explain what is meant by the negative 4,087 for the Overnight/2-Day change.
- c. Please confirm that the negative 44 for 2- Day/3-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from 2-Day service to 3-Day service for an average daily volume of 44 pieces. If not, please explain what is meant by the negative 44 for the overnight/2-Day change.

RESPONSE

- a. The volume of 4,087 total pieces is upgraded from 2-day to overnight and should have been listed in column 4.
- c. The volume of 44 pieces is an upgrade from 3-day to 2-day that should have been listed in Column 6

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OCA/USPS-8

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 90, FCM Service Commitments for the Pittsburgh P&DC.

- a. Please confirm that the (2,031) for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from Overnight to 2-Day service for an average daily volume of 2,031 pieces. If not, please explain what is meant by the negative 2,031 for the Overnight/2-Day change.
- b. Please confirm that the "0" for the 2-Day/3-Day change indicates that there is neither an upgrade nor a downgrade of the current 2-Day/3-Day service commitments for any of the average daily volume between the listed ZIP Code or ADC pairs.

RESPONSE

- a. That downgrade was proposed, but negated by the procurement of additional transportation to maintain the overnight service standard.
- b. Confirmed.

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OCA/USPS-9

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 111, FCM Service Commitments for the Trenton P&DC.

- a. Please confirm that the positive 55,874 for Overnight change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an improvement in service commitment from 2-Day to overnight service for an average daily volume of 55,874 pieces. If not, please explain the 55,874.
- b. Please confirm that the negative 55,874 for 2- Day/3-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from 2-Day service to 3-Day service for an average daily volume of 55,874 pieces. If not, please explain what is meant by the negative 55,874 2-Day/3-Day change.

RESPONSE

- a. Confirmed.
- b. It is not a downgrade of 55,874 pieces, but an indication that these pieces are being moved from 3-day to 2-day.

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OCA/USPS-10

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 145, FCM Service Commitments for the Fayetteville 28302.

- a. Please confirm that the 11,972 for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an upgrade in service commitment from 2-Day to Overnight service for an average daily volume of 11,972 pieces. If not, please explain what is meant by the 11,972 for the Overnight/2-Day change.
- b. Please confirm that the "0" for the 2-Day/3-Day change indicates that there is neither an upgrade nor a downgrade of the current 2-Day/3-Day service commitments for any of the average daily volume between the listed ZIP Code or ADC pairs.

RESPONSE

- a. Confirmed.
- b. Confirmed.

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OCA/USPS-11

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 161, FCM Service Commitments for the Sacramento P&DC.

- a. Please confirm that the positive 8,212 for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an improvement in service commitment from 2-Day to overnight service for an average daily volume of 8,212 pieces. If not, please explain the 8,212.
- b. Please confirm that the negative 8,212 for 2- Day/3-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from 2-Day service to 3-Day service for an average daily volume of 8,212 pieces. If not, please explain what is meant by the negative 8,212.

RESPONSE

- a. Confirmed.
- b. It is not a downgrade of 8212 pieces, but an indication that these pieces are being moved from 2-day to overnight.

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OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-12

The following interrogatory refers to library reference USPS-LR-N2006-1/5, page 177, FCM Service Commitments for the Bakersfield P&DC.

- a. Please confirm that the positive 4,729 for O/N change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an improvement in service commitment from 2-Day to overnight service for an average daily volume of 4,729 pieces. If not, please explain the 4,729 and (4,729) figures.

RESPONSE

- a. Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY
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OCA/USPS-13

The following interrogatory refers to library reference USPS-LR-N2006-1/5. Please confirm that for three of the ten Area Mail Processing Proposals included in that library reference, there are no FCM Service Commitment changes anticipated for Tacoma (page 33), Southern Ct P&DC (page 54), and the Boston P&DC (page 129).

RESPONSE

Confirmed.

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OCA/USPS-14

Please indicate if there any additional known upgrades or downgrades of First-Class Service Commitment mail volume for the ZIP Code or ADC pairs or any other pairs impacted by the ten proposals referenced in interrogatories OCA/USPS-6 through OCA/USPS-13. If so, please provide those changes in service commitments and the attendant average daily volume for the upgrades and/or downgrades for the ZIP Codes or ADC pairs related to any of the facilities involved in those ten proposals.

RESPONSE

There are no additional upgrades or downgrades.

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OCA/USPS-15

The following interrogatory refers to library reference USPS-LR-N2006-1/5. Please confirm that certain Priority Mail service commitments will be modified by the following six of the ten total proposals in that library reference: Santa Clarita (page 13), Stamford (page 75), Pittsburgh (page 91), Trenton (112), Sacramento (162), and Bakersfield (178). If you do not confirm, please explain.

RESPONSE

In each instance identified in the question, applicable Priority Mail service standards either remain the same or are being upgraded.

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OCA/USPS-16

The following interrogatory refers to library reference USPS-LR-N2006-1/6, Worksheet 7, FCM Service Commitments for the Los Angeles, CA P&DC, ZIP 900.

- a. Please confirm that the positive 39,117 for Overnight/2-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive an upgrade in service commitment from 2-Day to Overnight service for an average daily volume of 39,117 pieces. If not, please explain what is meant by the 39,117 for the Overnight/2-Day change.
- b. Please confirm that the negative 2,583 2-Day/3-Day change indicates that the listed originating and destinating ZIP Code or ADC pairs will receive a downgrade in service commitment from 2-Day service to 3-Day service for an average daily volume of 2,583 pieces. If not, please explain what is meant by the negative 2,583 for the 2-Day/3-day change.

RESPONSE

- a. Confirmed.
- b. Confirmed