

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-82 THROUGH 85)
(May 25, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of David Popkin filed on May 11, 2006: DBP/USPS-82 through 85. The interrogatories are stated verbatim and are followed by the responses.

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-82 Please refer to the listing provided in response to Interrogatory DBP/USPS-80. Bridgeport CT 066 is has overnight First-Class Mail to SCF Westchester NY while the other ZIP Code prefixes that are processed in the same Southern Connecticut P&DC, 063 064 and 065, do not have similar overnight service. Is this an error? If not, please explain why the 066 mail is segregated from the rest of the mail.

RESPONSE

As the result of an AMP, Originating Bridgeport CT (066) mail is now worked out of Stamford CT (along with 068-069) and is not worked out of the Southern Connecticut P&DC. ZIP Codes 066 and 068-069 are now all Overnight to Westchester NY 105.

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

DBP/USPS-83 Please refer to the response to Interrogatory DBP/USPS-81.

[a] Please explain why these 18 ZIP Code pairs process their Priority Mail in a manner to achieve overnight service while First-Class Mail is 2-day service. It is noted that one-third of the 18 are in the Caribbean area and another one-third are Portland ME to 047. [b] Please explain why the First-Class Mail service from Portland ME to Bangor ME 047 is 2-day standard while service to the rest of the Bangor ME SCF, 044, 046, and 049, is overnight. [c] Please discuss any efforts that have been made to, in effect, expand this listing and provide overnight service for Priority Mail to areas that are presently 2-day standard for First-Class Mail. [d] If no efforts have been made, please explain why not.

RESPONSE

- [a] To the best of our knowledge, the 18 pairs in question should all be 2-Day standards, rather than Overnight, but at some time in the past, the First-Class Mail standards were realigned to be 2-Days and either the Area did not request the same for Priority, or the Priority standards were likely overlooked. We are considering correcting these anomalies to become 2-Days in the future, as the 18 pairs are not consistently reachable in 1-Day.
- [b] There is no requirement that all Destinating ZIPs within a multi-ZIP SCF have the same Service Standard from the same Origin ZIP or Facility. In 1997, the Northeast Area requested an exception to 2-Day from Portland ME to Bangor ME (047 only), based on non-responsive Clearance Times and Critical Entry Times between the Portland-to-Bangor pair and frequent problems encountered by the related Air Taxi. These problems frequently made it impossible to reach Bangor 047 consistently in time to effectively achieve an Overnight delivery. After considerable review, the then Vice President Workforce Planning and Service Management received concurrence from the then Chief Operating Officer and the request to

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

RESPONSE to DBP/USPS-83 (continued):

change the Portland ME-to-Bangor ME 047 standard to 2-Days was approved and implemented effective February 28, 1998.

[c] There has been no effort in this area in recent years.

[d] As explained in (a), above, the 18 existing pairs should all be 2-Days and are not consistently reachable in 1-Day.

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

DBP/USPS-84 Please refer to USPS Library Reference N2006-1/11. Pages 23, 24, 53, 54, and 66 indicate that there were changes in the service standards as a result of the consolidation. Please explain and discuss how the needs of the customer were taken into account in making these changes.

RESPONSE

The Postal Service has been unable to locate any responsive records.

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

DBP/USPS-85 Please refer to your response to Interrogatory DBP/USPS-71.

[a] What does DOV stand for? [b] For each of the specific independent or subsidiary offices that had one or more of the 161 boxes under their jurisdiction changed from a final collection time of 5 PM to 4 PM, please provide a listing of the before consolidation and after consolidation times of the final dispatch to the plant from each of the involved offices.

RESPONSE

[a] Dispatch of Value.

[b] Objection filed.