

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

COMPELLED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN (DBP/USPS-91.a. – d.)  
(July 28, 2006)

Pursuant to Presiding Officer's Ruling No. R2006-1/19 (July 20, 2006), the United States Postal Service hereby provides its compelled response to the following interrogatory of David Popkin, filed on June 8, 2006: DBP/USPS-91.a. – d. The Motion to Compel was denied with respect to part e of question 91.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

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**DBP/USPS-91.** Section 313.1b of the Postal Operations Manual [POM] states, "Arrange schedules consistent with requirements of the local community and timely handling of mail at the processing point." Sections 321 through 326 provide detailed requirements for collection boxes. For example, Section 322.231 requires Time Decal Boxes to have two collections Monday through Friday with the last collection at 5 PM or later.

[a] May a local post office provide a condition [such as a 4 PM last weekday collection in front of the post office] where compliance of the detailed requirements covered in Sections 321 through 326 is not met by stating that the condition is necessary to meet the general requirements of Section 313.1b?

[b] If so, please discuss the reasons for this action.

[c] Please confirm, or explain if you are unable to confirm, that the requirements of Part 3 of the POM are mandatory at all city delivery offices as noted in Section 311.

[d] Please advise any sections of Part 3 of the POM that are not 100% mandatory due to changes in policy such as Section 322.233 which relates to Sunday collections.

[e] When will Part 3 of the POM be updated to cover any items covered in response to subpart d?

**RESPONSE::**

(a) Section 313.1(b) of the POM is one of several considerations that will be applied, in concert with 313(a) and 313(d), to establish collection service and collection schedules. However, in certain cases a local post office may establish a weekday collection in front of a post office prior to 5:00 PM that would be consistent with POM section 313.1, but not consistent with some sections of POM 321 through 326.

(b). For instance, post offices in some mountain communities may be several hours (or more) from the processing plant. A 5:00 PM last collection may not allow mail collected at 5:00 PM to be handled at the processing plant on that (processing) day, which could cause problems for customers. In this example, compliance with POM section 313.1 would take precedence over other

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requirements in POM sections 321 to 326, and an exception to POM sections 321 to 326 would be justified.

(c) The instructions in POM Part 3 apply to all city delivery offices as described in POM 311, but as noted above, exceptions to these instructions could be justified based on local circumstances.

(d) Other than the operational change to eliminate Sunday processing and Sunday collections noted in the interrogatory (which occurred in 1988), and the gradual reduction of holiday mail processing which has obviated the utility of holiday collections (and which has resulted in collection boxes no longer routinely listing holiday pick-up times), no other policy changes related to collection operations have been made that affected the POM, or made any sections of the POM obsolete. It should be noted that there is no way to respond to the "100% mandatory" language in the interrogatory, because with tens of thousands of postal facilities and hundreds of thousands of collection points, exceptions to the guidance in the POM should be expected, as described above.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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