

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001
EVOLUTIONARY NETWORK DEVELOPMENT] DOCKET NO. N2006-1
SERVICE CHANGES, 2006]

BRIEF OF DAVID B. POPKIN

October 19, 2006

Respectfully submitted,

N220061BRIEF

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

1. A number of considerations should be made in the consolidation of processing facilities. The following considerations should be made with respect to any changes to the service standards for First-Class Mail:

a. Increases in the service standards are obviously acceptable.

b. A decrease in the overnight delivery standards as a result of a consolidation should receive careful consideration including full publicity to the public of the proposed changes made in the affected area.

c. A transfer of areas from 2-day service standards to 3-day service standards should receive careful consideration but probably will not require extraordinary publicity efforts since these changes are probably less critical than changes to overnight delivery standards.

d. Any requirement to make earlier collection times at the blue collection boxes should still ensure that the collection times still meet the requirements of the Postal Operations Manual. Even if they still meet the requirements of the POM, they still should be considered.

2. In the Attachment to USPS-T-1 Witness Shah indicated that the following criteria should apply to the service standards for First-Class Mail:

First-Class Mail: 1-3 days, depending on the 3-digit ZIP Code of acceptance and the destination address. As with all mail classes, the same standard applies to all mail originating or destinating in the same 3-digit ZIP Code area and applies to all mail within the class, irrespective of shape, size or weight.

Current First-Class Service Standards were defined in PRC Docket No. N89-1, (USPS-T-2, Appendix A, at 7-8), as follows:

Overnight Delivery Standard:

Overnight delivery standards must include all of the intra-SCF area. Other areas may be considered for overnight delivery, if significant business/mail volume relationships exist and they are within the reasonable reach of surface transportation.

Two-Day Delivery Standard:

Two-day delivery standards apply to all SCF areas outside the overnight area that are within the home state and nearby states and that also are within the reasonable reach of surface transportation. In addition, twoday delivery standards may include other three-digit areas outside of the reasonable reach of surface transportation, if significant business/mail volume relationships exist and if dependable and timely air transportation is available.

Three-Day Delivery Standard:

Three-day delivery standards should include all remaining destinations. Docket No. N89-1, USPS-T-2, Appendix A , page 16,section 5.3 outlined the criteria that should be used in formulating 1-day and 2-day delivery standards:

Any single SCF or 3-digit ZIP destination within a 3-hour dock-to-dock transit time that receives more than 1.5% of a facility's originating volume should be evaluated for inclusion in the overnight area, based upon operational and transportation feasibility, and customer needs.

Any destination ADC that receives more than 0.5% of a facility's total originating volume should be evaluated for inclusion, based upon operational and transportation feasibility, and customer needs.

In 2000, the USPS defined "reasonable reach" to include the service areas of destinating Area Distribution Centers that were as far away as 12 hours drive time from the "parent" originating Processing and Distribution Center via surface transportation.

3. The service standards as indicated for 2-day mail were changed to utilize a 12-hour drive time and this was implemented. The standards shown in paragraph 4 on page 2 of the Attachment are not being followed as noted that 2-day standards should apply to areas within the same state and that air transportation should be used if there is sufficient volume [0.5% of the facility's total volume as indicated in paragraph 8].

4. The 12-hour drive time criteria seem to be implemented at virtually all of the processing facilities throughout the country.

5. The criteria shown in the Attachment for overnight service standards are shown as any SCF that is within a 3-hour dock-to-dock transit time that receives more than 1.5% of a facility's originating volume should be evaluated for inclusion in the overnight area.

6. As indicated in the response to Interrogatory DBP/USPS-6, there are five SCFs that have a volume of 1.5% of the origin volume for the Northern NJ P&DC and yet are not receiving overnight service.

7. My perception is that similar cutbacks in overnight service standards exist throughout the country. The Postal Service should be requested to re-evaluate their overnight service standard areas to include all of those areas that meet the listed criteria.

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 October 19, 2006
