

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-142-145)

The United States Postal Service hereby files its responses to the following
interrogatories of David Popkin: DBP/USPS-142-145, filed on January 28, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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March 15, 2002

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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DBP/USPS-142 Please refer to your response to DBP/USPS-137 subpart a.

- [a] What is the critical entry time at ADC Columbia?
- [b] If the response to subpart a is 21:50 or later, please explain why the mail from Miami FL 331 and arriving at the ADC at 21:50 will not receive 2-day delivery.
- [c] Please explain why the mail from P&DC Miami at 05:00 will not receive transportation on Delta flight 1539 departing at 06:50 [with the mail from South Florida P&DC].
- [d] Please explain why the mail from Miami P&DC arriving in Atlanta on Delta flight 2246 at 10:14 will not be able to be transported to Columbia on Delta flight 1006 departing Atlanta at 11:50 [with the mail from South Florida P&DC].
- [e] With only a 15-20 minute trip between the Columbia AMF/AMC and Columbia ADC, please provide a listing of the trips during the day and if there are any trips after 15:20 and before 21:50, please explain why the mail is not dispatched earlier than 21:50
- [f] Please explain the reasons why the Miami P&DC does not dispatch the Columbia ADC mail until 05:00 and what would be necessary to dispatch it earlier.

RESPONSE:

- (a) Based on the previously identified 2 & 3-Day Service Standard Model parameters outlined in DFC-LR-1, the 2-Day CET at ADC Columbia is NET 18:00, Day 1, and the 3-Day CET is 08:00, Day 2.
- (b) N/A
- (c) AMC Miami receives the mail at 05:00. The AMC requires a minimum of 1:00 hour to process the mail originating from the P&DC. There is a minimum of 00:20 minutes allowed for Air Contract Data Collection System (ACDCS) Close Out. The Postal Service is required to tender the mail to Delta Airlines in MIA a minimum of 01:00 hour prior to the flight departure. This means that the mail

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RESPONSE TO DBP/USPS-142 (continued):

might be ready, at the earliest, at 07:20. Delta flight 1539 departs at 06:50 (it is scheduled to move to 06:45 effective on 04/08/02), which is 30 minutes before the mail would be ready.

- (d) A Delta-to-Delta Intra-airline transfer at ATL is allotted a 2:00 hour transfer window at the Atlanta Airport between the hours of 10:01 and 24:00. This makes the mail ready at 12:14, which is 24 minutes after the departure of Delta flight-1006 at 11:50.

(e)

Scheduled Transportation Between AMC CAE and ADC Columbia SC (as of 2/8/02)			
Departs AMC Columbia	Arrives ADC Columbia	Route	Trip #
0005	0025	290VS	0005
0130	0209	270BK	16
0210	0235	290VS	0215
0220	0240	290L2	1
0230	0245	28018	13
0315	0330	290AD	1
0410	0430	290BD	1
0500	0520	290HT	1
1200	1220	30014	1
1520	1540	290VS	1520
1550	1610	30014	3
1650	1715	290GE	3702
2135	2150	290VS	ND
2140	2200	29011	10
2240	2300	290VS	2240

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RESPONSE TO DBP/USPS-142 (continued):

Note in the above table that, after the preparation of the earlier response to DBP/USPS-137, new trips were added in January 2002 at 15:50 and 16:50 between Columbia AMC and ADC Columbia.

The mail in question is scheduled to arrive at 15:31 via DL-1707. The airline has a total of 1:30 hours to tender the mail to the AMC. The AMC is allowed a mere 15 more minutes to sort the mail to the final destination, which does not make the mail available until, at least, 17:16, if every target time is met. As per the above schedule, the next trip after 17:16 is the trip at 21:35. The mail arrives at ADC Columbia at 21:50, which is still 10:05 hours prior to the 08:00, Day-2, CET of 08:00.

- (f) Your statement is incorrect, as the response to DBP/USPS-137 [a] states, in part, "Trip 331VS1063 departs Miami at 04:45..." not 05:00. However, the trip does arrive at AMC MIA at 05:00.

The mail Clearance Time at Miami P&DC at 04:30. The next available trip to Miami AMC is 04:45, which is why that is the trip used. In order to dispatch it earlier, a trip would have to be scheduled between 04:30 and 04:45.

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DBP/USPS-143 Please refer to your response to DBP/USPS-137 subparts c and j.

[a] Please advise why there is insufficient data to make the determination.

[b] Are records kept of what mail is sent on what flight?

[c] Are there any employees who are able to provide an estimate of the percentage?

RESPONSE:

(a&b) Postal transportation data systems m track the weight of mail which travels between two airstops, such as Miami to Atlanta, but it does not distinguish either the specific facility of origin (such as Miami, South FL, Ft. Lauderdale or West Palm Beach, all of which route mail through MIA at various times of the day) or the intended delivery day (2-Day vs. 3-Day) of the individual sacks or trays of mail.

(c) None who might be able to provide a reliable guesstimate has been identified.

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DBP/USPS-144 Please refer to your response to DBP/USPS-137 subparts b and l.

- [a] Please confirm, or explain if you are unable to do so, that by placing the scheduled delivery day of the week on the destination label it can also [in addition to the obvious reason for putting the day on the label] increase the likelihood to delay processing this mail during the normal workday and putting it off until a future time thereby achieving delivery on the scheduled date rather than delivering the mail a day earlier than scheduled.
- [b] Has any study been conducted to evaluate this phenomenon? If so, please provide a copy.
- [c] What is the policy at the Columbia ADC for processing the mail “ahead of time”?
- [d] What is the national policy?

RESPONSE:

- (a) The inclusion of the scheduled Day-of-Delivery on the label assists in the alignment of processing operations so that mail arriving from various sources, at various times of the day can be arranged in such a fashion as to properly sequence the processing of the mail in order to achieve the intended Service Standard. Without such identifiers, there would be occasions where, for instance, 3-Day mail would be processed and delivered ahead of 2-Day mail. While delivering 3-Day mail on the 2nd day (where possible and operationally feasibly) would “normally” be considered a positive result, this would not be the case if such non-sequential processing causes some 2-Day mail to miss delivery on the 2nd day. Therefore, mail is sequenced by scheduled delivery day in order to minimize these latter occurrences.
- (b) The Postal Service has not undertaken a study to determine whether the phenomenon alleged in this question even occurs.

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RESPONSE TO DBP/USPS-144 (continued):

(c&d) The following are the processing, dispatch, and delivery priorities at the national and local levels, based on the Dispatch and Routing Handbook (M-22), previously filed as part of USPS LR C2001-3/5:

- a. Express Mail.
- b. Priority Mail and First-Class (2-Day) Mail.
- c. First-Class 3-Day Mail.
- d. Newspaper treatment and other Periodical mail.
- e. Package Services Mail
- f. Standard mail.

While the above represents official processing priorities, it is also general practice that postal facilities may process 1-Day, 2-Day and 3-Day First-Class Mail concurrently at various times of the day. However, “advanced processing” should not be performed to the detriment of meeting an established “earlier” First-Class Mail Service Standard. See the response to subpart (a) above.

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DBP/USPS-145 Please refer to your response to DBP/USPS-137 subpart p.

- [a] Please explain why, since air transportation was in fact being used for mail to Columbia ADC from both Miami and South Florida P&DCs and since the South Florida P&DC mail was upgraded from 3-day to 2-day standard, why the mail from the Miami P&DC was not similarly upgraded.
- [b] Please explain why the potential for changing the mode of transportation at some time in the future is relevant to your response.

RESPONSE:

- (a) The parameters of the 2 & 3-Day Model have been previously explained in responses to earlier interrogatories. The 12 hour projected drive time was the determining factor between a 2-Day standard and a 3-Day standard. The specific drive time information between all Origin P&DCs and all Destinating ADCs has been previously provided in USPS-LR-1-OCA-12B-1.

South Florida P&DC 330 is an Origin P&DC dispatching mail to ADC Columbia SC 290. The projected drive time is 11:36; therefore, the pair was designated for a 2-Day standard. The projected drive time between Origin P&DC Miami FL 331 to ADC Columbia SC 290 is 12:06, making it a 3-Day standard under the 2 & 3-Day Model.

- (b) The word “potential” was used because, under the parameters of the 2 & 3-Day Model, should the mail in question be shifted from air to surface in the future, then the mail from South Florida can meet the planned latest acceptable Expected Time of Arrival (ETA) at ADC Columbia SC, while the mail from Miami would arrive too late. Please see the above response to subpart (a).