

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO PUBLIC REPRESENTATIVE INTERROGATORIES  
(PR/USPS-T1-4 AND 5)  
(May 21, 2010)

The United States Postal Service hereby provides the responses of witness Pulcrano to the above-listed interrogatories of the Public Representative dated May 7, 2010. The interrogatories are stated verbatim and followed by the responses. A response by witness Pulcrano to T1-8 is forthcoming. Interrogatories PR/USPS-T1-1 through T1-3, 6 and 7 have been redirected to the Postal Service for institutional responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 21, 2010

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

**PR/USPS-T3-4**

In USPS-LR-N2010-1/1 at 19, it is stated that full-up savings refers to “the annual savings and associated volume reductions after the transition period needed to reduce staffing and adapt contracts, plants and equipment to eliminate Saturday delivery.” Can you provide an estimate, in terms of months, for how long the Postal Service expects the entire transition period to last?

**RESPONSE**

The length of the transition will be contingent upon the results of the collective bargaining that will be necessary to develop certain changes in working conditions, the length of time necessary to implement those changes, and the proximity of those changes to the implementation of the five-day plan. Another factor will be the timing of the 5-day change in relation to existing transportation contracts and contractual changes that may need to be negotiated and implemented. Assuming implementation of the five-day plan some time during calendar year 2011 (six months after an implementation date is announced), it seems clear that a year’s worth of full-up savings will not be realized in FY 2011. It would be more realistic to expect savings to approach or achieve “full-up” levels in FY 2012.

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**PR/USPS-T3-5**

At USPS-T-1 at 3, you state: "... Saturday delivery may be viewed as a competitive advantage that the Postal Service should be loath to relinquish." Has the Postal Service estimated the dollar value of the competitive advantage associated with street delivery on Saturday?

**RESPONSE:**

I am not aware of any such estimate.