

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

**Six-Day to Five-Day Street Delivery
and Related Service Changes, 2010**

Docket No. N2010-1

**DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS DEAN J. GRANHOLM (DFC/USPS-T3-1-8)**

April 1, 2010

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Dean J. Granholm.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please

provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

Dated: April 1, 2010

DOUGLAS F. CARLSON

DFC/USPS-T3-1. Please provide a copy of all documents, including memos, letters, directives, and other materials distributed on a nationwide or substantially nationwide basis, that discuss the Postal Service's current policy or practice for collection schedules and collection times on Saturdays.

DFC/USPS-T3-2. Please provide a copy of all documents, including memos and directives, that provide the Postal Service's current service standards, policy, and guidelines for weekday and Saturday collection times for collection boxes located in "business areas," as the Postal Service defines the term "business areas." In your response, please include the Postal Service's definition of the term "business areas."

DFC/USPS-T3-3. Please provide a copy of every record relating to an exception that Postal Service headquarters has granted to permit the Saturday collection schedule for a collection box to deviate from Postal Service policy.

DFC/USPS-T3-4. Please discuss the extent to which collection boxes located under the jurisdiction of city-delivery offices that qualify for a weekday collection time at 5:00 PM or later pursuant to POM § 322.1 do, in fact, have a final collection time on weekdays at 5:00 PM or later. Please explain in detail the basis for your response.

DFC/USPS-T3-5. Please identify any plans to adjust weekday collection schedules, including posted collection times on Fridays, if the Postal Service eliminates Saturday collections from blue collection boxes.

DFC/USPS-T3-6. Please identify the post offices that have collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays. For each post office in your response, please provide the number of collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays.

DFC/USPS-T3-7. Please identify the post offices that have collection boxes in “business areas,” as the Postal Service defines this term, that qualify as a “time-decal” box pursuant to POM § 322.1 and that do not have a Saturday collection scheduled for each box. For each post office in your response, please provide the number of “time-decal” collection boxes that do not have a Saturday collection scheduled.

DFC/USPS-T3-8. Please identify the information that the Postal Service may require a customer to provide before the Postal Service will act on a service complaint asserting that a collection box should, but currently does not, have a weekday collection time at 5:00 PM or later pursuant to POM § 322.1 because the collection box receives an average weekday volume of 100 pieces of mail or more. In your response, please explain how the Postal Service will process the service complaint if the customer does not provide the required information.