

**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 FRANK NERI (DFC/USPS-T4-1-9)**

**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 Frank Neri.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Granholm (DFC/USPS-T3-1-8) are incorporated herein by reference.

Respectfully submitted,

Dated: April 1, 2010

DOUGLAS F. CARLSON

**DFC/USPS-T4-1.** Please refer to your testimony at page 6. Please explain the difference between a “Managed Mail Program (MMP) sort scheme” and an “incoming primary sort scheme.”

**DFC/USPS-T4-2.** Please refer to your testimony at page 9. Please explain in detail the changes that the Postal Service would make to sort plans and software to allow post office box mail to be sorted for delivery on Saturdays. Your response should discuss mail destined to post office boxes that have unique ZIP Codes as well as mail destined to post office boxes that share the ZIP Code of addresses that receive carrier delivery.

**DFC/USPS-T4-3.** Please refer to your testimony at page 12. Please provide detailed information on the Advanced Facer Cancellor 200, including system capabilities and functionality and the deployment schedule.

**DFC/USPS-T4-4.** Please refer to your testimony at page 12. Please explain what Lean Six Sigma tools are.

**DFC/USPS-T4-5.** Please refer to your testimony at pages 11–12. Does the Postal Service assume that no mailer behavior would change on Fridays? Please explain.

**DFC/USPS-T4-6.** Did the Postal Service consider retaining collection and processing of outgoing mail on Saturdays and expanding existing area mail processing, or consolidation, plans on Saturdays?

**DFC/USPS-T4-7.** For each processing facility that processes outgoing mail on weekdays but not on Saturdays, please indicate the plant to which that processing facility forwards its mail for processing on Saturdays. For purposes of this interrogatory, a “processing facility” is a P&DF, a P&DC, or a post office that postmarks and distributes mail.

**DFC/USPS-T4-8.** Approximately which percentage of average weekday volume of single-piece First-Class Mail (including Priority Mail) does the Postal Service process on a typical Saturday?

**DFC/USPS-T4-9.** Please describe distribution operations for each shape of outbound First-Class Mail International and Priority Mail International mail and how processing operations and delivery times may or may not be affected by the possible elimination of collection and processing of outgoing mail on Saturdays. In your response, please specify the facilities that process outgoing international mail and for how many days after the initial postmark date these facilities may still be handling the mail before it is tendered to a transportation company for its outbound journey from the United States.