

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

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

Docket No. N2010-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CARLSON INTERROGATORY DFC/USPS-T6-1,
REDIRECTED FROM WITNESS BRADLEY
(April 15, 2010)

The United States Postal Service hereby provides its response to the following interrogatory of Douglas Carlson, filed on April 1, 2010: DFC/USPS-T6-1, redirected from witness Bradley. Each interrogatory is stated verbatim and is followed by the response.

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

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April 15, 2010

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF DOUGLAS CARLSON, REDIRECTED FROM WITNESS BRADLEY**

DFC/USPS-T6-1. Please identify and estimate the transportation costs that the Postal Service would not save if it decided to continue to collect and process outgoing mail on Saturdays from collection boxes and some postal facilities (such as facilities that are open for retail window service or that provide post office box delivery). Please identify assumptions underlying your response.

RESPONSE:

Please see the response to DFC/USPS-T2-3, redirected from witness Corbett to the Postal Service. As indicated in that response, the Postal Service has not conducted the detailed operational analyses that would be necessary to provide an estimate for any alternative service change scenarios, including the one posed in this question, comparable to the cost estimates submitted by the Postal Service's witnesses. As also indicated in that response, however, broadly speaking, it seems plausible to suspect that most if not all of the Transportation savings achievable under the proposed 5-day environment would be lost under the alternative 5-day environment postulated in this question. The only readily apparent possible exception might be the costs associated with Box Routes, for which Table 6 at page 18 of USPS-T-7 shows an estimated savings of \$35 million.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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