

**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-T4-10-16)**

April 20, 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 20, 2010

DOUGLAS F. CARLSON

DFC/USPS-T4-10. Please refer to your response to DFC/USPS-T4-1. Please provide an example of the level of sortation achieved on an incoming primary sort plan.

DFC/USPS-T4-11. Please refer to your response to DFC/USPS-T4-2. Under the DPS software changes to allow mail destined to post office boxes to be delivered on Saturdays, compared to current operations, please confirm that mail destined to post office boxes on Saturdays would pass through a DPS sort plan exactly one extra time (the first pass through a DPS sort plan on Friday night or Saturday morning, which would trap mail destined to post office boxes for further processing on a DPS sort plan), but all other mail, including mail destined to street addresses on Saturday or Monday and mail destined to post office boxes on Monday, would not be run through a DPS sort plan any more times than it is now. If you do not confirm, please explain.

DFC/USPS-T4-12. Please refer to your response to DFC/USPS-T4-3. Please provide an example of how the 12 separations on the AFCS 200 might be programmed.

DFC/USPS-T4-13. Please refer to your response to DFC/USPS-T4-6. Please explain whether the Postal Service considered additional opportunities for consolidating outgoing mail processing operations on Saturdays in a scenario in which the Postal Service did not deliver mail to street addresses on Saturdays but continued to collect and process mail from collection boxes and post offices on Saturdays. This interrogatory assumes that outgoing mail volume under such a scenario would be lower than current volume because carriers would not collect outgoing mail from homes and businesses on their routes.

DFC/USPS-T4-14. Please refer to your response to DFC/USPS-T4-7. Please identify the cost savings from each existing Saturday area mail processing plan.

DFC/USPS-T4-15. Please refer to your response to DFC/USPS-T4-5. Please identify the “multiple scenarios” of mailer behavior on Fridays that the Postal Service is examining.

DFC/USPS-T4-16. Please refer to your response to DFC/USPS-T4-6. Please provide the approximate percentage of average weekday volume of single-piece First-Class Mail (including Priority Mail) that the Postal Service processes on a typical Saturday. For example, if the volume on an average weekday is 1 billion pieces, and if the volume on an average Saturday is 600 million pieces, the answer to the interrogatory would be 60 percent.