

**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-T3-13-28)**

**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 Dean J. Granholm.

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-T3-13.** Please refer to your response to DFC/USPS-T3-1. Please confirm that Postal Service policy requires a Saturday collection for every collection box under the jurisdiction of city-delivery offices that is accessible to the public on Saturdays. If you do not confirm, please explain and provide the policy and service standards for collection schedules on weekdays and Saturday for collection boxes for which a Saturday collection is not required.

**DFC/USPS-T3-14.** Please refer to your response to DFC/USPS-T3-1. Please explain whether a Saturday collection is required for every Express Mail collection box that is accessible to the public on Saturdays.

**DFC/USPS-T3-15.** If the Postal Service implemented the plan that it proposes in this docket, would it collect mail from every Express Mail collection box on Saturdays? Please explain.

**DFC/USPS-T3-16.** Please identify the percentage of post offices that have at least one Express Mail collection box anywhere in their service area.

**DFC/USPS-T3-17.** If the Postal Service implemented the plan that it proposes in this docket, would it install any additional Express Mail collection boxes? Please explain.

**DFC/USPS-T3-18.** Please refer to your response to DFC/USPS-T3-1 at PDF page 33. Please discuss and describe the outcome of the re-evaluation of collection policy and guidelines.

**DFC/USPS-T3-19.** Please refer to your response to DFC/USPS-T3-1 at PDF page 33. Please describe any actions taken as a result of the November 16, 2007, memo from Vice President Kathy Ainsworth that brought some locations or collection boxes “into compliance.”

**DFC/USPS-T3-20.** Please refer to your response to DFC/USPS-T3-1 at PDF page 33. Please describe the “wholesale changes to collection profiles resulting

in a significant degradation of service from a customer's perspective" that districts enacted.

**DFC/USPS-T3-21.** Please refer to your response to DFC/USPS-T3-1 at PDF page 34. Please describe the actions taken to reverse or correct the "wholesale changes to collection profiles resulting in a significant degradation of service from a customer's perspective" that districts enacted.

**DFC/USPS-T3-22.** Please refer to your response to DFC/USPS-T3-3. Please confirm that the Postal Service issued an exception to the policy requiring Saturday collections for certain collection boxes located in business areas in response to a complaint from me about a city where no Saturday collection was scheduled for some collection boxes in business areas. If you do not confirm, please explain.

**DFC/USPS-T3-23.** Please refer to your response to DFC/USPS-T3-3, where you stated that "service was not changed." Please confirm that the Postal Service did not post Saturday collection times for any of the 104 collection boxes in Boise, Idaho, that I identified as not having a Saturday collection time. If you do not confirm, please explain.

**DFC/USPS-T3-24.** Please refer to your response to DFC/USPS-T3-3 at PDF page 37. For a collection box that currently has no Saturday collection time posted, please explain why the Postal Service believes that the need for a Saturday collection at this collection box can be accurately determined by measuring the volume in the collection box on a Saturday.

**DFC/USPS-T3-25.** Please refer to your response to DFC/USPS-T3-5. Do you believe that the Postal Service's collection schedules comply with agency policy and service standards and provide customers with adequate collection services? Please explain your answer.

**DFC/USPS-T3-26.** Please refer to your response to DFC/USPS-T3-8. Please confirm that your response applies to service complaints that the Postal Service received or processed in 2009 and 2010.

**DFC/USPS-T3-27.** Please provide the policy or guideline for setting collection times on Express Mail collection boxes.

**DFC/USPS-T3-28.** If the Postal Service implements the plan that it proposes in this docket, please provide the percentage of post offices that will offer neither retail window service on Saturdays nor an Express Mail collection box that has a Saturday collection.