

**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 SAMUEL PULCRANO (DFC/USPS-T1-2-11)**

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 Samuel Pulcrano.

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-T1-2. Please confirm that the Postal Service does not permit individual customers to participate in MTAC activities. If you do not confirm, please explain.

DFC/USPS-T1-3. Please provide the approximate date on which the Postal Service began the process that led to the proposal in this docket and the approximate date on which the Postal Service stopped considering continuing to collect and process outgoing mail on Saturdays as part of a reduction in service on Saturdays.

DFC/USPS-T1-4. On balance, does the Postal Service believe that a service change that resulted in two consecutive days without collection and processing of outgoing mail would be better or worse for postal customers than the current service level, which, except for holiday weekends, provides for only one day without collection and processing of outgoing mail?

DFC/USPS-T1-5. Did the Postal Service ask customers questions, or conduct market research, that permitted the agency to compare customers' comparative preference for a plan that would maintain collection and processing of outgoing mail on Saturdays versus a plan that would terminate collection and processing of outgoing mail on Saturdays? If yes, please provide all available information and data.

DFC/USPS-T1-6. Please refer to your response to DFC/USPS-T1-1. Do you believe that most employees who collect mail from collection boxes are letter carriers who also are delivering mail to street addresses on the same days as they are collecting mail from collection boxes?

DFC/USPS-T1-7. Please refer to your response to DFC/USPS-T1-1, where you stated, "We did not receive any significant indication from our research or outreach efforts with customers that the costs associated with the collection and processing of outgoing mail would be offset by a retention of volume." Does the Postal Service believe that eliminating collection and processing of outgoing mail

on Saturdays will not result in any diversion of First-Class Mail to e-mail, Internet, fax, telephone, or other communication methods or delivery companies? Please explain.

DFC/USPS-T1-8. Did the Postal Service consider using dedicated collection routes, perhaps spanning multiples cities or post offices, to collect outgoing mail on Saturdays?

DFC/USPS-T1-9. Please refer to your response to DFC/USPS-T1-1. Please provide further explanation and all available analyses supporting your conclusion that it would be “relatively costly and operationally inefficient to transport and process” only mail from collection boxes at or near post offices on Saturdays.

DFC/USPS-T1-10. Please refer to your response to DFC/USPS-T1-1, where you stated, “Our market research and outreach programs indicate that customers generally will adjust their behavior accordingly and a portion of their current Saturday mail will more likely be deposited for collection on a Friday or Monday.”

- a. Please discuss what would happen to the portion of current Saturday mail that customers would *not* deposit for collection on a Friday or Monday.
- b. Please confirm that, if the Postal Service eliminated collection and processing of outgoing mail on Saturdays, customers would have no choice but to adjust.

DFC/USPS-T1-11. Why do you believe that eliminating collection and processing of outgoing mail on Saturdays would be fair to customers who need this service?