

**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-T3-29-35)**

April 22, 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 22, 2010

DOUGLAS F. CARLSON

DFC/USPS-T3-29. If the Postal Service implemented the plan that it proposes in this docket, please confirm that two truck round-trips would occur on every Saturday between the processing plant and each postal facility that delivered mail to post office boxes on Saturdays and collected Express Mail on Saturdays. If you do not confirm, please explain.

DFC/USPS-T3-30. If the Postal Service implemented the plan that it proposes in this docket, please confirm that postal retail facilities that accepted Express Mail on Saturdays would dispatch all available mail on Saturdays, including mail collected at the retail window and in lobby drops, on the dispatch truck that carried outgoing Express Mail. If you do not confirm, please explain.

DFC/USPS-T3-31. If the Postal Service implemented the plan that it proposes in this docket, please confirm that the dispatch truck from postal retail facilities that accepted Express Mail on Saturdays likely would not be filled to capacity.

DFC/USPS-T3-32. Please explain whether the Postal Service would consider a collection box located outdoors on the property of a large shopping mall, such as White Flint Mall in Montgomery County, Maryland, to be located in a business area for the purpose of determining the collection times that Postal Service policy would require for this collection box.

DFC/USPS-T3-33. Please explain whether the Postal Service would consider a collection box located outdoors on private property in the parking lot of a supermarket or underneath the eaves of the supermarket building, next to the building entrance, to be located in a business area for the purpose of determining the collection times that Postal Service policy would require for this collection box.

DFC/USPS-T3-34. If the Postal Service implemented the plan that it proposes in this docket, please confirm that each postal facility that collected Express Mail on Saturdays also would dispatch available outgoing mail, including First-Class Mail deposited in lobby drops, on Saturdays.

DFC/USPS-T3-35. If the Postal Service implemented the plan that it proposes in this docket, please confirm that each postal facility that collected Express Mail on Saturdays also would run an operation to prepare mail for dispatch that would be similar to, but perhaps smaller than, it runs now.