

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

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

Docket No. N2010-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DEAN J. GRANHOLM
(APWU/USPS-T3-1-8)
(April 23, 2010)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Dean J. Granholm (USPS-T-3). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Joseph Corbett (APWU/USPS-T2-1-6), filed on April 23, 2010, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-T3-1 On page 3 of your testimony, lines 19-20, you state that “Current Post Office Box delivery will remain intact on Saturday for customer convenience.” Does this mean that there will be mail delivered to the Post Office that day and sorted to the Post Office Boxes or does it mean that customers will continue to have access to their Post Office Boxes to pick up mail that was delivered and sorted on Friday?

APWU/USPS-T3-2 On page 5 of your testimony, lines 17-18, you indicate that “to manage Monday work hours, delivery supervisors will likely defer non-committed mail for delivery on Tuesday.”

- a.) Please define “non-committed mail” and describe the types of mail that would fall into this category.
- b.) How long would this mail typically have been waiting in the Post Office by the time it is delivered?
- c.) If there is a Monday holiday, when is this mail likely to be delivered?

APWU/USPS-T3-3 On page 5 of your testimony, lines 18-21, you state that due to “increased mail volume on Fridays, Mondays and Tuesdays, there may be increased work hours in the form of overtime and/or auxiliary assistance.” The Postal Service currently has a virtual ban on all overtime hours. Given that it will continue to be looking for additional savings, how likely is it that delivery supervisors will be allowed to use overtime hours to deliver increased volumes?

APWU/USPS-T3-4 On page 8 of your testimony you discuss the impact on mailers who normally drop ship mail on Saturday. Could you please clarify the following:

- a.) You state “destination drop-shipped mail will still have a start the clock event on the day it is accepted by the USPS, provided it is entered prior to the local critical entry time.” Will destination drop-shipped mail still be accepted on Saturdays?
- b.) What is the average number of pieces drop shipped at originating units on Saturdays? Will it be possible to provide all the Saturday shippers Friday slots if they do not want their mail to sit around until Monday processing times?
- c.) Will the reduced window of operation for drop ship appointments only be reduced on Saturday? Will the window for appointments on Friday be increased?
- d.) You also state that “[i]n the future, the window of operation for drop shipment acceptance will align with retail hours due to the limited distribution operations on a Saturday.” Will retail hours be extended to

accommodate an increased need for drop shipment acceptance times Monday-Friday?

APWU/USPS-T3-5 On page 9 lines of your testimony, 9-12 you estimate “that no more than ten percent of Saturday delivery time will be needed on the other days of the week under five day delivery.” Please explain whether this ten percent is cumulative over Monday – Friday or is an increase added to each day.

APWU/USPS-T3-6 On page 10 of your testimony, you discuss the impact on collections operations. On lines 10-13 you state”

Field managers will also need to consider the impact of heavier collection volume on Monday outgoing operations – they may need to advance collection mail arrival at the plant. Advancing collection mail could require additional work hours Mondays.

- a.) Please explain what is meant by “advance collection mail arrival at the plant.”
- b.) If Monday is a holiday, will collection mail arrival be advance on Tuesdays? Will additional work hours be needed on Tuesdays?
- c.) How many additional work hours to you estimate will be necessary on either Monday or a Tuesday after a Monday holiday? Please explain the basis for this estimate.

APWU/USPS-T3-7 On page 11 of your testimony, lines 17-19 you indicate that “because of the forecast of a continuing decline in volume and the in-office impact of FSS implementation, work hours on City routes should remain very near eight hours daily.”

- a.) Will FSS deployment and ramp up be complete at all locations by the time the Postal Service moves to a 5-day delivery schedule?
- b.) Will the implementation of 5-day delivery be determined by when the FSS deployment is complete?
- c.) How much leeway is there in this estimate of Monday and Tuesday mail volumes for work hours to remain near eight hours? What if mail volumes recover to 2008 levels instead of continuing to fall? What if they remain at 2009 levels instead of continuing to fall?

APWU/USPS-T3-8 On page 7 of your testimony, lines 13-15 you state that there is a “37% PO Box vacancy rate nationally” and therefore, new requests related to businesses requiring PO boxes when the Saturday delivery of their holdout mail is

discontinued could be accommodated. In Docket No. N2009-1, the Postal Service averred that it anticipates sufficient PO Box space to allow it to accommodate customers who have PO Boxes in stations and branches that will be closed with replacement PO Boxes in the post office closest to them.

- a.) Have the overlapping demands of these two programs been evaluated together?
- b.) What percentage of the PO Box vacancies are currently in stations or branches on the list for possible closure?