

**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 GREGORY M. WHITEMAN (DFC/USPS-T9-1-10)**

April 26, 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 Gregory M. Whiteman.

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 26, 2010

DOUGLAS F. CARLSON

DFC/USPS-T9-1. Please refer to your testimony at page 5, lines 12–14. Please identify and provide the responses from customers and the other facts, information, and data that, in your opinion, support your assertion that the absence of collection and processing of outgoing mail on Saturdays would create “no problems” for customers.

DFC/USPS-T9-2. Please refer to your testimony at page 5, lines 12–14, where you stated that “most indicated they would mail a day earlier or wait until Monday.” Please explain the actions that other people not falling into the majority, as your use of the term “most” suggests, would take to compensate for the absence of collection and processing of outgoing mail on Saturdays.

DFC/USPS-T9-3. Please provide all facts and information that, you believe, support your contention that customers would support, or would not oppose, the elimination of collection and processing of outgoing mail on Saturdays.

DFC/USPS-T9-4. Please explain your understanding, in terms of dollars and cents, of the meaning of “significant price increase” as you used the term in your testimony at page 3.

DFC/USPS-T9-5. Please refer to your testimony at page 6, lines 1–5. Please identify any plans the Postal Service has to provide improvements in customer service to offset a reduction in delivery service.

DFC/USPS-T9-6. Please refer to your testimony at page 7, lines 7–9. Please identify the percentage of customer respondents who suggested “later pickup of mail from collection boxes on Friday” and provide transcripts and other records relating to this suggestion.

DFC/USPS-T9-7. Please refer to your testimony at page 7, lines 10–13. Did the Postal Service explain that outgoing mail deposited in collection boxes currently may be postmarked on Saturdays but would not be postmarked on Saturdays if

the Postal Service implemented the proposal in this docket? Please explain your answer.

DFC/USPS-T9-8. Please refer to your testimony at Appendix A, page 2, lines 1–3. Please explain whether the Postal Service advised customers during its market research that mail deposited for collection on Saturdays and destined to cities for which the service standard is two days or more would be delayed two days if the Postal Service stopped collecting and processing outgoing mail on Saturdays.

DFC/USPS-T9-9. Please refer to your testimony at page 5, lines 12–14, where you stated that “most indicated they would mail a day earlier or wait until Monday.” Please identify the actions other than to mail a day earlier or to wait until Monday that you might have expected a participant to suggest.

DFC/USPS-T9-10. Please explain whether the Postal Service informed customers during its market research that mail (except Express Mail) tendered to a window clerk or deposited in a lobby drop on Saturday would not be processed until Monday.