

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 FRANK NERI (DFC/USPS-T4-22-24)

May 4, 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 Frank Neri.

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: May 4, 2010

DOUGLAS F. CARLSON

DFC/USPS-T4-22. Please provide the number of AFCS machines at each facility that cancels and processes outgoing mail.

DFC/USPS-T4-23. For each facility that cancels and processes outgoing mail on Saturdays, please provide the percentage of the AFCS cancellation volume at that facility on an average weekday that that facility's AFCS machines cancel on an average Saturday. For example, if the cancellation volume on an average weekday is 1 million pieces, and if the cancellation volume on an average Saturday is 600,000 pieces, the answer to the interrogatory would be 60 percent.

DFC/USPS-T4-24. For each facility that cancels and processes outgoing mail on Saturdays, please express the AFCS cancellation volume at that facility on an average Saturday as a percentage of AFCS cancellation capacity at that facility. With reference to appropriate Postal Service productivity benchmarks, please determine a reasonable measure of AFCS cancellation capacity and explain the measure you selected.