

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Six-Day to Five-Day Street Delivery
and Related Service Changes

Docket No. N2010-1

Public Representatives' Interrogatories and Requests
for Production of Documents to United States Postal Service Witness Granholm
(PR/USPS-T3-1 through 4)

(May 4, 2010)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission's Rules of Practice, the Public Representatives hereby submit the following set of interrogatories and requests for production of documents to Postal Service witness Granholm. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions set out in the Appendix to the Public Representatives' Interrogatories to Witness Pulcrano, dated May 4, 2010, are incorporated by reference.

Respectfully Submitted,
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PR/USPS-T3-1

In USPS-LR-N2010-1/1 at 19, it is stated that full-up savings refers to “the annual savings and associated volume reductions after the transition period needed to reduce staffing and adapt contracts, plants and equipment to eliminate Saturday delivery.” Can you provide an estimate, in terms of months, for how long the Postal Service expects the entire transition period to last?

PR/USPS-T3-2

At USPS-T-1 at 3, you state: “... Saturday delivery may be viewed as a competitive advantage that the Postal Service should be loath to relinquish.” Has the Postal Service estimated the dollar value of the competitive advantage associated with street delivery on Saturday?

PR/USPS-T3-3

In USPS-LR-N2010-1/1 at 4, it is stated that “... a significant portion of the current workforce — 44 percent — is eligible to retire between now and 2014.” Please provide the retirement attrition rate for several recent fiscal years by Craft and for management (and by any other readily-available breakdown) or identify where this information can be found in publicly-available documents.

PR/USPS-T3-4

Under the Postal Service’s 5-day delivery plan as presently configured, is it correct that there will be disparate impact on Commercial Mail Receiving Agents (CMRAs), depending on whether the CRMA business plan uses a street address or a Postal Service-provided post office box?