

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

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

Docket No. N2010-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORIES OF DOUGLAS CARLSON  
(DFC/USPS-T4-10 through 14, 16)

The United States Postal Service hereby provides the responses of witness Frank Neri to the following interrogatories of Douglas Carlson dated April 20, 2010: DFC/USPS-T4-10 through 14 and 16. Each interrogatory is stated verbatim and is followed by the response.

Interrogatory DFC/USPS-T4-15 has been redirected to the Postal Service for an institutional response that is being filed separately.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS FRANK NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

**DFC/USPS-T4-10**

Please refer to your response to DFC/USPS-T4-1. Please provide an example of the level of sortation achieved on an incoming primary sortplan.

**RESPONSE**

An example would be mail received at a destinating facility in a three-digit ZIP Code format that required a five-digit distribution prior to DPS.

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**DFC/USPS-T4-11**

Please refer to your response to DFC/USPS-T4-2. Under the DPS software changes to allow mail destined to post office boxes to be delivered on Saturdays, compared to current operations, please confirm that mail destined to post office boxes on Saturdays would pass through a DPS sort plan exactly one extra time (the first pass through a DPS sort plan on Friday night or Saturday morning, which would trap mail destined to post office boxes for further processing on a DPS sort plan), but all other mail, including mail destined to street addresses on Saturday or Monday and mail destined to post office boxes on Monday, would not be run through a DPS sort plan any more times than it is now. If you do not confirm please explain.

**RESPONSE**

Confirmed.

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**DFC/USPS-T4-12**

Please refer to your response to DFC/USPS-T4-3. Please provide an example of how the 12 separations on the AFCS 200 might be programmed.

**RESPONSE**

Bins will be programmed based upon locally established densities that minimize re-handling by providing a separation for subsequent sortplan distribution or dispatch. For example, a particular facility may program one bin for a high-density 3-digit ZIP Code prefix that could be dispatched out of the plant immediately after the cancellation process, requiring no further handlings.

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**DFC/USPS-T4-13**

Please refer to your response to DFC/USPS-T4-6. Please explain whether the Postal Service considered additional opportunities for consolidating outgoing mail processing operations on Saturdays in a scenario in which the Postal Service did not deliver mail to street addresses on Saturdays but continued to collect and process mail from collection boxes and post offices on Saturdays. This interrogatory assumes that outgoing mail volume under such a scenario would be lower than current volume because carriers would not collect outgoing mail from homes and businesses on their routes.

**RESPONSE**

Please see the response of Postal Service Witness Pulcrano (USPS-T-1) to DFC/USPS-T1-8, filed today.

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**DFC/USPS-T4-14**

Please refer to your response to DFC/USPS-T4-7. Please identify the cost savings from each existing Saturday area mail processing plan.

**RESPONSE**

There is no headquarter-sponsored Saturday consolidation program. Individual district managers assess the opportunities and, where economically feasible and while maintaining service, consolidate Saturday originating mail for selected sites into other sites. District managers are empowered to evaluate these opportunities and make these decisions on their own, at the local level.

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**DFC/USPS-T4-16**

Please refer to your response to DFC/USPS-T4-6. Please provide the approximate percentage of average weekday volume of single-piece First-Class Mail (including Priority Mail) that the Postal Service processes on a typical Saturday. For example, if the volume on an average weekday is 1 billion pieces, and if the volume on an average Saturday is 600 million pieces, the answer to the interrogatory would be 60 percent.

**RESPONSE**

Assuming that this interrogatory refers to the response to DFC/USPS-T4-8 (rather than the response to DFC/USPS-T4-6), based on recorded volumes for the period of October 17, 2009 through November 6, 2009 (selected as representative of average weeks that exclude holidays), it is estimated that the average Saturday experiences 43.8% of the average weekday (Monday through Friday) outgoing operations volume.