

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

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DOUGLAS CARLSON INTERROGATORIES DFC/USPS-T1-4, 5, 7 AND 10  
REDIRECTED FROM WITNESS PULCRANO  
(May 4, 2010)

The United States Postal Service hereby provides its responses to the above-listed interrogatories of Douglas Carlson dated April 20, 2010. The interrogatories have been redirected from witness Pulcrano to the Postal Service for the provision of institutional responses. Each interrogatory is stated verbatim and followed by the institutional response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 4, 2010

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON  
REDIRECTED FROM WITNESS PULCRANO**

**DFC/USPS-T1-4.** On balance, does the Postal Service believe that a service change that resulted in two consecutive days without collection and processing of outgoing mail would be better or worse for postal customers than the current service level, which, except for holiday weekends, provides for only one day without collection and processing of outgoing mail?

**RESPONSE**

The Postal Service does not concur with the notion that six days of collection and processing of single-piece First-Class Mail per week are inherently “better” or that five days per week are inherently “worse.” The Postal Service’s view is that preferences for six-day street delivery vs. five-day street delivery should be balanced against whether it is “better” or “worse” to have a more financially and operationally stable Postal Service.

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**DFC/USPS-T1-5.** Did the Postal Service ask customers questions, or conduct market research, that permitted the agency to compare customers' comparative preference for a plan that would maintain collection and processing of outgoing mail on Saturdays versus a plan that would terminate collection and processing of outgoing mail on Saturdays? If yes, please provide all available information and data.

**RESPONSE**

No. The Postal Service did not conduct quantitative or qualitative market research that enabled evaluation of customer preference regarding the eight percent of single piece First-Class Mail (including Priority Mail) mail volume processed on Saturdays.

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**DFC/USPS-T1-7.** Please refer to your response to DFC/USPS-T1-1, where you stated, “We did not receive any significant indication from our research or outreach efforts with customers that the costs associated with the collection and processing of outgoing mail would be offset by a retention of volume.” Does the Postal Service believe that eliminating collection and processing of outgoing mail on Saturdays will not result in any diversion of First-Class Mail to e-mail, Internet, fax, telephone, or other communication methods or delivery companies? Please explain.

**RESPONSE**

The Postal Service expects that a number of factors will continue to contribute to the ongoing diversion of First-Class Mail to alternative media. It is possible that some First-Class Mail could be diverted to alternative media if some customers who currently mail on Saturdays elect such options in lieu of mailing on Monday through Friday.

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**DFC/USPS-T1-10.** Please refer to your response to DFC/USPS-T1-1, where you stated, “Our market research and outreach programs indicate that customers generally will adjust their behavior accordingly and a portion of their current Saturday mail will more likely be deposited for collection on a Friday or Monday.”

a. Please discuss what would happen to the portion of current Saturday mail that customers would *not* deposit for collection on a Friday or Monday.

b. Please confirm that, if the Postal Service eliminated collection and processing of outgoing mail on Saturdays, customers would have no choice but to adjust.

**RESPONSE**

- (a) Based on its market research, the Postal Service expects the vast majority of customers to adjust. This could result in some mail formerly deposited on Saturdays being deposited on other days of the week including Fridays or Mondays. Still, some customers may choose not to adjust and could continue to exercise the choice of depositing mail in collections boxes on Saturdays. It is possible that some customers may elect to use alternative media or delivery services.
- (b) Not confirmed. See the response to subpart (a).