

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 UNITED STATES POSTAL SERVICE WITNESS PULCRANO
TO DOUGLAS CARLSON INTERROGATORIES DFC/USPS-T1-2, 3, 6, 8 AND 11
(May 4, 2010)

The United States Postal Service hereby provides the responses of witness Samuel Pulcrano to the above-listed interrogatories of Douglas Carlson dated April 20, 2010. Each interrogatory is stated verbatim and followed by the institutional response. Interrogatories DFC/USPS-T1-4, 5, 7 and 10 have been redirected from witness Pulcrano to the Postal Service for the provision of institutional responses, which are being filed separately today. A response to DFC/USPS-T1-9 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 4, 2010

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

DFC/USPS-T1-2. Please confirm that the Postal Service does not permit individual customers to participate in MTAC activities. If you do not confirm, please explain.

RESPONSE

I am informed that membership in MTAC is generally comprised of mailer associations and other associations/organizations related to the mailing industry.

The member associations/organizations of MTAC, collectively are intended to reflect the mailing industry in terms of classes and categories of mail used, major industries that depend on mail service, and organizations with significant or unique mailing needs.

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DFC/USPS-T1-3. Please provide the approximate date on which the Postal Service began the process that led to the proposal in this docket and the approximate date on which the Postal Service stopped considering continuing to collect and process outgoing mail on Saturdays as part of a reduction in service on Saturdays.

RESPONSE

The process began in March 2009. The concept of eliminating Saturday collection and outgoing processing became part of the operating concept not long thereafter. The operating concept was not finalized until February 2010, at which time it could be said that any consideration of preserving Saturday collection and processing of outgoing mail ceased.

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DFC/USPS-T1-6. Please refer to your response to DFC/USPS-T1-1. Do you believe that most employees who collect mail from collection boxes are letter carriers who also are delivering mail to street addresses on the same days as they are collecting mail from collection boxes?

RESPONSE

I am informed that over three-quarters of all collection points are picked up by carriers during their normal delivery rounds.

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DFC/USPS-T1-8. Did the Postal Service consider using dedicated collection routes, perhaps spanning multiples cities or post offices, to collect outgoing mail on Saturdays?

RESPONSE

See my response to DFC/USPS-T1-5. It is assumed that the question relates to the process through which the operating concept presented to the Commission for review in this docket was developed. My recollection is that the concept of dedicated Saturday collection routes was considered by members of the cross-functional Five Day Team, but not pursued or developed in the absence of any concurrent plan to continue processing of outgoing collection mail at plants on Saturdays.

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DFC/USPS-T1-11. Why do you believe that eliminating collection and processing of outgoing mail on Saturdays would be fair to customers who need this service?

RESPONSE

I understand that some customers may prefer collection and outgoing processing of mail on Saturdays and even have a strong preference for that option, but I am not certain that such “preference” translates into a “need” in every instance, or that such customers could not adjust some of their mailing practices with little or no burden. The Postal Service does not consider it inherently unfair that mail entered during specified time frames is subject to certain processing and delivery expectations, while mail entered during other time frames is subject to different processing and delivery expectations.