

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
DEAN J. GRANHOLM TO DOUGLAS F. CARLSON INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS (DFC/USPS-T3- 13-28)
(May 5, 2010)

The United States Postal Service hereby provides the responses of witness
Dean J. Granholm to the following interrogatories of Douglas F. Carlson, filed on April
20, 2010:

DFC/USPS-T3- 13-28

.Each interrogatory is reprinted below, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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Docket No. N2010-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DEAN J, GRANHOLM
(USPS-T-3) TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T3-13. Please refer to your response to DFC/USPS-T3-1. Please confirm that Postal Service policy requires a Saturday collection for every collection box under the jurisdiction of city-delivery offices that is accessible to the public on Saturdays. If you do not confirm, please explain and provide the policy and service standards for collection schedules on weekdays and Saturday for collection boxes for which a Saturday collection is not required.

RESPONSE:

This statement is not confirmed. Saturday collection service is required for residential boxes (POM 323.41) and for time decal boxes (POM 322.232). Saturday collections from business boxes are not specifically required under the Postal Operations Manual (POM), but may be done under POM Section 313.7.

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DFC/USPS-T3-14. Please refer to your response to DFC/USPS-T3-1. Please explain whether a Saturday collection is required for every Express Mail collection box that is accessible to the public on Saturdays.

RESPONSE:

No. Postal Operations Manual Section 325.3 establishes that the District Manager or designee determines where there is a need for Express Mail collection service and its frequency.

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DFC/USPS-T3-15. If the Postal Service implemented the plan that it proposes in this docket, would it collect mail from every Express Mail collection box on Saturdays? Please explain.

RESPONSE:

With the implementation of this plan, it is planned that the field will be directed to schedule Saturday collection service for all accessible Express Mail collection boxes.

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DFC/USPS-T3-16. Please identify the percentage of post offices that have at least one Express Mail collection box anywhere in their service area.

RESPONSE:

According to a facilities database, 20.35% of post offices have Express Mail collection boxes.

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DFC/USPS-T3-17. If the Postal Service implemented the plan that it proposes in this docket, would it install any additional Express Mail collection boxes? Please explain.

RESPONSE:

Express Mail collection boxes are installed based on Section 325.3 of the Postal Operations Manual. There is no national plan to expand the number of collection boxes, but if a District Manager, or their designee, sees a local community need after the implementation of this plan, they have the authority to install additional Express Mail collection boxes.

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DFC/USPS-T3-18. Please refer to your response to DFC/USPS-T3-1 at PDF page 33 [November 16, 2007 Kathy Ainsworth memo]. Please discuss and describe the outcome of the re-evaluation of collection policy and guidelines.

RESPONSE:

Discussions were held with diverse groups of managers at different levels to evaluate alternatives and modifications to current policy and procedures.

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DFC/USPS-T3-19. Please refer to your response to DFC/USPS-T3-1 at PDF page 33. Please describe any actions taken as a result of the November 16, 2007, memo from Vice President Kathy Ainsworth that brought some locations or collection boxes “into compliance.”

RESPONSE:

There are no records that show what specific actions may have been taken in the field as a result of the memo cited.

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DFC/USPS-T3-20. Please refer to your response to DFC/USPS-T3-1 at PDF page 33. Please describe the “wholesale changes to collection profiles resulting in a significant degradation of service from a customer’s perspective” that districts enacted.

RESPONSE:

As reflected in the memo, conversations between the author of the November 16, 2007 memo and other persons at the National Executive Conference in 2007 highlighted changes in the collection activities of some districts. The terms “collection profiles” and “number of districts” in the memo were broad references to changes in Collection Point Management System (CPMS) information, although the CPMS was not reviewed or consulted in the preparation of the memo. “Collection profile” is not a defined term, and the author of the memo used the term to refer generally to the myriad collection activities of an office or district. These terms were not referencing specific documents, information, or districts. No responsive documents exist that “individually or collectively, relate to or reflect the ‘collection profiles’” referred to in the memo, nor do any documents exist that reflect “possible interpretations” of the term ‘collection profiles.’ Similarly, no responsive documents exist that identify specific districts in relation to this memo.

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DFC/USPS-T3-21. Please refer to your response to DFC/USPS-T3-1 at PDF page 34 [June 30, 2008 Jordan Small memo]. Please describe the actions taken to reverse or correct the “wholesale changes to collection profiles resulting in a significant degradation of service from a customer’s perspective” that districts enacted.

RESPONSE:

The actions taken in reference to the “wholesale changes to collection profiles resulting in a significant degradation of service from a customer’s perspective” that districts enacted occurred prior to Mr. Smalls’s memo, and were not a result of that memo.

These involved districts reviewing posted individual box collection times for adherence to postal policy Per Postal Operations Manual Section 313.1.

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DFC/USPS-T3-22. Please refer to your response to DFC/USPS-T3-3. Please confirm that the Postal Service issued an exception to the policy requiring Saturday collections for certain collection boxes located in business areas in response to a complaint from me about a city where no Saturday collection was scheduled for some collection boxes in business areas. If you do not confirm, please explain.

RESPONSE:

This statement cannot be confirmed due to our inability to determine what specific complaint is being referred to.

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DFC/USPS-T3-23. Please refer to your response to DFC/USPS-T3-3, where you stated that “service was not changed.” Please confirm that the Postal Service did not post Saturday collection times for any of the 104 collection boxes in Boise, Idaho, that I identified as not having a Saturday collection time. If you do not confirm, please explain.

RESPONSE:

This statement cannot be confirmed. The exception granted in Exhibit T-3 required further steps be taken before any specific site exception is issued by the Western Area.

They state that these further steps were not taken and thus they granted no specific exceptions under that authority. This question is not germane to the Exception matter documented in T-3-3, but in specific matters answered by letter from the Postal Service on 2-13-2009 and 3-19-2009.

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DFC/USPS-T3-24. Please refer to your response to DFC/USPS-T3-3 at PDF page 37 [July 22, 2009 Phil Knoll memo]. For a collection box that currently has no Saturday collection time posted, please explain why the Postal Service believes that the need for a Saturday collection at this collection box can be accurately determined by measuring the volume in the collection box on a Saturday.

RESPONSE:

The bullet under section 2 of this memo should read “If no current Saturday collection (mail volume counts exist) for the box, use mail volume counts from at least two Saturdays.”

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DFC/USPS-T3-25. Please refer to your response to DFC/USPS-T3-5. Do you believe that the Postal Service's collection schedules comply with agency policy and service standards and provide customers with adequate collection services? Please explain your answer.

RESPONSE:

Establishment of collection schedules is a local function as specified in POM Section 313.1. Working under the overall national policy as spelled out in the POM, each local office must manage their collection schedules and per Section 313.1.d, "review operations continually to make modifications as justified by changed conditions." While it appears from data analyzed for this response that not every post office is following agency policy, this data does not reflect local situations and conditions. Apparently in many situations this is meeting local customer demand based on the minimal number of customer complaints received.

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DFC/USPS-T3-26. Please refer to your response to DFC/USPS-T3-8. Please confirm that your response applies to service complaints that the Postal Service received or processed in 2009 and 2010.

RESPONSE:

I cannot confirm that all service complaints received by the Postal Service in 2009 and 2010 adhered to this process. Due to the low volume of complaints received in Consumer Affairs on collection box pick up times, we do not isolate them in our national database. Secondly, these issues would be handled locally and should not appear in our data if resolved.

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DFC/USPS-T3-27. Please provide the policy or guideline for setting collection times on Express Mail collection boxes.

RESPONSE:

Policy for establishing Express Mail box collection times is established by Postal

Operations Manual Sections 313.7 and Section 325.3 and 325.4.

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DFC/USPS-T3-28. If the Postal Service implements the plan that it proposes in this docket, please provide the percentage of post offices that will offer neither retail window service on Saturdays nor an Express Mail collection box that has a Saturday collection.

RESPONSE:

Our data show that 16.4% of post offices, classified stations and branches and finance stations and branches will not offer retail service on Saturday. Due to the use of different data bases, it is not feasible to compare closed retail window service offices with the 4,587 Express Mail boxes that have a Saturday collection.