

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO
TO DOUGLAS CARLSON INTERROGATORY DFC/USPS-T1-9
(May 5, 2010)

The United States Postal Service hereby provides the response of witness Samuel Pulcrano to the above-listed interrogatory of Douglas Carlson dated April 20, 2010. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 5, 2010

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

DFC/USPS-T1-9. Please refer to your response to DFC/USPS-T1-1. Please provide further explanation and all available analyses supporting your conclusion that it would be “relatively costly and operationally inefficient to transport and process” only mail from collection boxes at or near post offices on Saturdays.

RESPONSE

First, one would expect that, if Post Office collection boxes were the only ones swept on Saturdays, customers would be influenced to adjust by depositing some mail on other days of the week, rather than visit a Post Office simply to deposit mail on Saturday. Thus, overall Saturday collection volume would likely decline. Starting from that base, it would mean that less collection mail would be transported to plants on Saturdays and less outgoing mail would be run through cancellation and outgoing processing operations on Saturdays. Although, we have performed no empirical analysis of the hypothetical scenario that you propose, I am advised by mail processing operations experts that these lower volumes would be unlikely to meet thresholds that resulted in efficient utilization of the transportation and processing operations through which such mail would flow, compared to if such mail were massed with larger volumes of Monday collection mail and processed then.