

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268B0001

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

Docket No. N2010-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
WITNESS GROSSMANN TO DOUGLAS CARLSON INTERROGATORIES
DFC/USPS-T3-28 & T3-31 (REDIRECTED FROM WITNESS GRANHOLM)
(May 6, 2010)

The United States Postal Service hereby provides its responses to the above-listed interrogatories of Douglas Carlson dated April 22, 2010. These interrogatories have been redirected from witness Granholm to witness Grossmann for response. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS GRANHOLM**

DFC/USPS-T3-28. If the Postal Service implemented the plan that it proposes in this docket, please confirm that two truck round-trips would occur on every Saturday between the processing plant and each postal facility that delivered mail to post office boxes on Saturdays and collected Express Mail on Saturdays. If you do not confirm, please explain.

RESPONSE:

Not confirmed. The amount of volume to be transported between a processing plant and a postal facility will determine the capacity requirement. This could necessitate more than two round-trips, or could necessitate fewer than two round-trips. In the latter case, where feasible, a multi-stop route could be constructed to stop at more than one postal facility in order to more fully utilize transportation from the associated processing plant.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS GRANHOLM**

DFC/USPS-T3-31. If the Postal Service implemented the plan that it proposes in this docket, please confirm that the dispatch truck from postal retail facilities that accepted Express Mail on Saturdays likely would not be filled to capacity.

RESPONSE:

Not confirmed. Until the Postal Service's plan is implemented, the Postal Service does not have data about how full the trucks will be for facilities that accept Express Mail.

Where feasible, multi-stop routes could be created that would allow for fuller utilization of transportation.