

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- 4, 6-7)
(May 7, 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 1,
2010:

DFC/USPS-T3- 4, 6-7

The Postal Service filed objections to these interrogatories on April 12, 2010. In filing
these responses, the Postal Service is not waiving its objections. Each interrogatory is
reprinted below, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Pricing and Product Support

Brian Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037; Fax -5492

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-T3-4. Please discuss the extent to which collection boxes located under the jurisdiction of city-delivery offices that qualify for a weekday collection time at 5:00 PM or later pursuant to POM § 322.1 do, in fact, have a final collection time on weekdays at 5:00 PM or later. Please explain in detail the basis for your response.

RESPONSE:

Delivery and Post Office Operations requires offices to follow the guidelines in the POM and establish collections as required in POM 322.1. Based on minimal customer complaints received from the general public, it appears that the field does adhere to this policy. The CPMS system does not record daily collection box volume. Those data are collected by local survey. Thus, the Postal Service cannot provide a percentage response to this question.

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

DFC/USPS-T3-6. Please identify the post offices that have collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays. For each post office in your response, please provide the number of collection boxes in residential areas that do not have a Saturday collection scheduled for each box that is accessible to the public on Saturdays.

RESPONSE:

The Postal Service's data systems have no information on whether a collection box is accessible to the public on a weekend, or when any co-located business may be closed.

Therefore, the Postal Service cannot provide the information sought by this interrogatory.

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

DFC/USPS-T3-7. Please identify the post offices that have collection boxes in “business areas,” as the Postal Service defines this term, that qualify as a “time-decal” box pursuant to POM § 322.1 and that do not have a Saturday collection scheduled for each box. For each post office in your response, please provide the number of “time-decal” collection boxes that do not have a Saturday collection scheduled.

RESPONSE:

In order for a business box to qualify for a time decal, it must generate a daily average of 100 or more pieces on weekdays per POM 322.1. The CPMS system does not record daily collection box volume. Those data are collected by local survey.

Therefore, the Postal Service cannot provide the information sought by this interrogatory.