

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Six-Day to Five-Day Street Delivery
and Related Service Changes

Docket No. N2010-1

Public Representatives' Interrogatories and Requests for Production
of Documents to United States Postal Service Witness Pulcrano
(PR/USPS-T1-4 through 9)

(May 6, 2010)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission's Rules of Practice, the Public Representatives hereby submit the following interrogatories and requests for production of documents to Postal Service witness Pulcrano. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions set out in the Appendix to Public Representatives' Interrogatories directed to witness Pulcrano (dated May 4, 2010), are incorporated by reference.

Respectfully Submitted,
/s/ Patricia Gallagher

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PR/USPS-T1-4

At USPS-T1 at 2, you observe that the regular delivery of mail six days a week in the United States has a long history. Postal Service witness Elmore-Yalch's testimony (USPS-T8 at 7) further indicates that focus group participants were told that "Federal law has required that mail be picked up and delivered six days a week since 1983.")

Are you familiar with the circumstances that led to or influenced adoption of the referenced 1983 requirement or with any studies that may have influenced Congress, such as the "The Necessity for Change" (U.S. House of Representatives, Committee on Post Office and Civil Service, Committee Print No. 94-26, 94th Congress, 2d Sess., issued Dec. 10, 1976)? If so, please describe the circumstances and identify any studies for the record.

PR/USPS-T1-5

Is it the Postal Service's view that "the federal law" referred to in the focus group discussions (described in witness Elmore-Yalch's testimony) is the only binding provision that forecloses the Postal Service from making a unilateral change in the longstanding six-day street delivery model, given the non-binding nature of the Commission's advisory opinion?

PR/USPS-T1-6

At USPS-T1 at 4, you state that the Postal Service intends to implement elimination of routine mail delivery to street addresses on Saturday, and witness Elmore-Yalch's testimony (USPS-T8 at 7) states that focus group participants were told that "[t]he Postal Service has asked Congress earlier this year to approve a reduction in service to five days a week."

Does the Postal Service's stated intention to eliminate routine Saturday delivery, to which you refer at USPS-T1 at 4, assume that Congress acts on the Postal Service's request prior to implementation and/or prior to any significant supporting changes?

PR/USPS-T1-7

Please identify with specificity when and under what circumstances the Postal Service asked Congress “earlier this year” [prior to the focus group sessions referred to in witness Elmore-Yalch’s testimony] to approve a reduction in service to five days a week and provide any related documents, including draft or proposed legislation or other supporting material.

PR/USPS-T1-8

If not provided in response to other interrogatories in this set, please clarify for the record the precise type or scope of legislative change the Postal Service is asking for from Congress in connection with the anticipated delivery frequency change, per the statement in the focus group moderators’ materials referred to in witness Elmore-Yalch’s testimony, including whether the Postal Service is seeking several alternatives to the existing provision. For example, is the Postal Service asking Congress to re-word the existing legislative restriction to strictly conform to a five-day “no Saturday” street delivery model (in keeping with the caption of the instant docket), is it seeking complete elimination of the existing legislation provision, or is it seeking some other formulation of the existing legislative provision?

PR/USPS-T1-9

At USPS-T1 at 5 through 8, you generally note that the Postal Service has considered “stakeholder concerns.” Stakeholders are broadly categorized as senders and receivers, so policy maker are not included. If not addressed in a response to other interrogatories in this set of interrogatories, please describe in detail how the Postal Service has addressed or is addressing Congressional concerns about the proposal, including those expressed at recent Congressional hearings, and any plans it has for informing the Congress about post-implementation impact, if the proposal is implemented largely as proposed.