

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

**Six-Day to Five-Day Street Delivery
and Related Service Changes, 2010**

Docket No. N2010-1

**DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS REBECCA ELMORE-YALCH (DFC/USPS-T8-4-9)**

May 11, 2010

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Rebecca Elmore-Yalch.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Granholm (DFC/USPS-T3-1–8) are incorporated herein by reference.

Respectfully submitted,

Dated: May 11, 2010

DOUGLAS F. CARLSON

DFC/USPS-T8-4. Please confirm that all the Postal Service's market research advised respondents that eliminating collection and processing of outgoing mail on Saturdays would "generally add a day to the delivery" of mail deposited in a collection box after the final collection time on Friday. If you do not confirm, please explain and specifically identify how the Postal Service described the delay.

DFC/USPS-T8-5. At the time when you designed, supervised, or conducted the market research for the plan for five-day service that the Postal Service has presented in this docket, were you aware that mail deposited on a Saturday and destined to a city for which the First-Class Mail service standard is two days or more would be delayed for two days if the Postal Service eliminated collection and processing of outgoing mail on Saturdays? Please explain your response.

DFC/USPS-T8-6. If you were asked to measure public support for a plan that caused mail to be delayed by two days, please explain whether you would advise respondents that the mail would be delayed by two days or by some other number of days.

DFC/USPS-T8-7. Please provide the percentages of outgoing First-Class Mail for which the service standard for delivery is one day, two days, three days, four days, and five days.

DFC/USPS-T8-8. During the market research, did the Postal Service provide to or discuss with respondents the service standards for First-Class Mail? Please explain.

DFC/USPS-T8-9. During the market research, did the Postal Service explain to respondents that some First-Class Mail normally will be delivered in two to five days?