

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

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

Docket No. N2010-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORY DBP/USPS-37
(May 14, 2010)

The United States Postal Service hereby files this objection to the above-identified interrogatory of David Popkin dated May 4, 2010. The interrogatory is repeated below and followed by a statement of the basis for the objection.

DBP/USPS-37

Please refer to your response to Interrogatory DBP/USPS-22.

[a] Can Saturday consolidations take place across District boundaries?

[b] If not, why not?

[c] For each of the several hundred plants that are consolidated on a Saturday, please advise which facilities, in [sic] any, resulted in a change of First-Class Mail service standards taking into account that there is no delivery on Sunday. In other words are there any 3-Digit Zip Code locations that are changed from a two-day service standard to a three-day service standard by the act of consolidation? Likewise where a three-day area became a two-day area.

[d] What was the average savings in cost as the result of a Saturday consolidation?

In this docket, the Postal Service has requested an advisory opinion from the Commission on planned nationwide service changes that affect the delivery of mail to street addresses and the outgoing processing of mail on Saturdays. None of the subparts of DBP/USPS-37 are relevant to the Postal Service's request. Rather, they are relevant only to the filing party's general curiosity about Postal Service operations and/or such party's personal proposal for saving money for the Postal Service, neither

of which are at issue in this docket. Accordingly, the Postal Service objects to providing the information sought by the interrogatory.

Nevertheless, the Postal Service wishes to make two points regarding the interrogatory. First, in regard to subpart [c], Saturday consolidation decisions are made at the local level, and the expectation is that such consolidations will not be made where they would result in an inability to meet applicable service standards, which do not vary on the basis of what day mail is entered. See 39 C.F.R. § 121 and 122.2. Because Saturday consolidations have been conducted at the discretion of district managers in an ongoing fashion over an extended period of time, there is little if any data available to pinpoint whether there are any exceptional cases of Saturday consolidations that have resulted in service standard downgrades.

Second, in regard to subpart [d], despite the irrelevance of the question to the request at issue in this docket, the Postal Service has already answered the question in its response to DFC/USPS-T4-14. To summarize that response, the Postal Service does not collect data on Saturday consolidation cost savings.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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