

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

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO  
DOUGLAS F. CARLSON INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS DEAN J. GRANHOLM (DFC/USPS-T3- 43-44, 51-52)  
(May 20, 2010)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the above-listed interrogatories submitted by Douglas Carlson on May 10, 2010. Each interrogatory is reprinted below, with the reasons for objecting following.

In the cases of DFC/USPS-T3- 43 and 44, the Postal Service's objection applies to both interrogatories:

**DFC/USPS-T3-43.** Please refer to your response to DFC/USPS-T3-19. Did any postal official responsible for collection service or collection policy perform any follow-up steps or otherwise become aware of any actions taken as a result of the November 16, 2007, memo from Vice President Kathy Ainsworth to bring some locations or collection boxes "into compliance"? If yes, please identify those postal officials. If not, please explain why not.

**DFC/USPS-T3-44.** Please refer to your response to DFC/USPS-T3-20. Please consult with an individual who can describe the "wholesale changes to collection profiles resulting in a significant degradation of service from a customer's perspective" that districts enacted, and please provide the name of that person and the information that you learned from this person.

These interrogatories ask for information that is irrelevant to this docket, which concerns a Postal Service plan to eliminate or reduce certain operations, including collections from collection boxes along delivery routes on Saturdays.

Mr. Carlson is asking the Vice President, Delivery and Post Office Operations, to provide names of subordinate employees on his staff who may or may not have performed certain actions that are wholly unrelated to 5-day delivery. This information is not relevant to this docket. Moreover, in accordance with customary practice before the Commission, the Postal Service does not believe it needs to identify non-witness individuals by name, as those names are irrelevant. Therefore, the Postal Service objects to these interrogatories.

In the cases of DFC/USPS-T3- 51 and 52, the objection applies to both interrogatories:

**DFC/USPS-T3-51.** Please refer to Office of the Inspector General audit report EN-AR-08-006. In the table below, please confirm, for each California post office listed, that the column titled “Before” reflects the final collection time on weekdays at the post office before the consolidation of outgoing mail processing operations from the Mojave post office to the Bakersfield P&DC, and the column titled “Current” reflects the final collection time at the post office on weekdays after the consolidation of outgoing mail processing operations from the Mojave post office to the Bakersfield P&DC. If you do not confirm, please explain.

<b>Post Office</b>	<b>Before</b>	<b>Current</b>
ACTON	1625	1600
BIG PINE	1600	1300
BISHOP	1430	1230
BRIDGEPORT	1200	0900
CALIENTE	1545	1530
DARWIN	1130	1100
EDWARDS	1630	1555
INDEPENDENCE	1645	1345

INYOKERN	1600	1545
JOHANNESBURG	1615	1540
JUNE LAKE	1300	0950
KEELER	1230	1100
KEENE	1620	1530
LEE VINING	1245	0930
LITTLE ROCK	1700	1630
LONE PINE	1700	1400
MAMMOTH LAKES	1400	1130
MOJAVE	2000	1700
OLANCHA	1545	1415
PALMDALE	1715	1700
RIDGECREST	1715	1500

**DFC/USPS-T3-52.** Please refer to Office of the Inspector General audit report EN-AR-08-006. Please estimate the number of post offices in the 935 ZIP Code area at which mail that carriers collect on their routes is not routinely or consistently dispatched to the processing plant on the same day as the carriers collect the mail.

These two interrogatories do not ask for, nor are they calculated to lead to, information relevant to this docket. They refer to a Postal Service Office of the Inspector General audit of the Mojave, California, Post Office consolidation project, and the resultant routing of mail, transportation changes, and service performance. There is no relationship between the consolidation of the Mojave Post Office and the Postal Service's nationwide plan to eliminate or reduce certain operations on Saturdays. Therefore, the Postal Service objects to these interrogatories.

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