

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 THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-T1-1 THROUGH 3 AND T1-7)
(May 21, 2010)

The United States Postal Service hereby provides an institutional response to the above-listed interrogatories of the Public Representative dated May 7, 2010. The interrogatories have been redirected from witness Pulcrano to the Postal Service for institutional responses. The interrogatories are stated verbatim and followed by the responses. An institutional response to PR/USPS-T1-6 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 21, 2010

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE PUBLIC REPRESENTATIVE
REDIRECTED FROM WITNESS PULCRANO**

PR/USPS-T1-1

Exhibit 3 in USPS-LR-N2010-1/1 at 22 shows a volume change of -4.43% for Express Mail, assuming 5-day delivery had been implemented in FY 2009. Assuming for the purpose of this interrogatory that the Postal Service's proposal to change delivery frequency is adopted in FY 2011 and Express Mail is the only product which will be delivered on Saturday, has the Postal Service projected the impact on Express Mail volume or have any expectation about the impact under either a full- or partial implementation scenario? In particular, does the Postal Service expect Express Mail volume to continue to decline (and to have the greatest decline in terms of volume percentage) under a 5-day scenario?

RESPONSE

For the purposes of this filing, the Postal Service relies on the volume change of -4.43 percent for Express Mail reflected in USPS-LR-N2010-1/1 at 22.

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PR/USPS-T1-2

Assuming for the purpose of this interrogatory that the Postal Service's proposal to change delivery frequency is adopted and Express Mail is the only product which will be delivered on Saturday, does the Postal Service anticipate making any changes to Express Mail rates, terms or conditions, other than the postage refund terms and conditions proposed at 74 FR 22725 (April 30, 2010)?

RESPONSE

No such proposals are part of the request in this docket. See the Postal Service's response to DPB/USPS-16. Of course, any Express Mail product changes (in addition to those at 74 FR 22725) that are decided upon by the Postal Service during or after the pendency of the instant docket would be subject to the public notice requirements of 39 U.S.C. § 3632.

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PR/USPS-T1-3

Has the Postal Service considered introducing any new mailing products specifically because it is interested in adopting a 5-day street delivery model?

RESPONSE:

See the response to PR/USPS-T1-2. New product development was not part of the charter of the Five Day Team. Nor was there any formal effort to blend any potential new product concepts with the implementation of the five-day plan. It is to be expected that some postal employee or organizational unit at headquarters, during the course of or since the development of the five-day concept, has given or will give thought to the prospect of product or service changes that could be attractive to customers subject to five-day delivery. If a decision is made to move forward with any product changes, such changes will be subject to review under either 39 U.S.C. §§ 3622 or 3632.

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PR/USPS-T1-7

Under the Postal Service's 5-day delivery plan as presently configured, is it correct that there will be disparate impact on Commercial Mail Receiving Agents (CMRAs), depending on whether the CRMA business plan uses a street address or a Postal Service-provided post office box?

RESPONSE:

Virtually all customers having a street address will receive regular mail delivery Monday through Friday under the five-day plan. Street delivery is the preferred option of the overwhelming majority of postal customers, whether they are residential customers or businesses, or whether any of those residential or business customers serve as the agent for the receipt of mail for others, or engage in other activities related to the mail they receive. Under the five-day delivery plan, no preference is granted to any street addressee based on the nature of any personal circumstance, on the basis of personal or commercial or agency relationships or agreements between addressees and anyone designated to accept mail on their behalf, or on the basis of any commercial or other enterprise operated at any street address.

The elimination of street delivery on Saturdays is expected to reduce the frequency of delivery for virtually all customers who prefer street delivery and do not receive Post Office Box delivery, while generally retaining the current Monday through Saturday delivery frequency for all Post Office Box customers. This delivery frequency difference – street vs. Post Office Box -- affects all mail recipients, whether or not they serve as mail receiving agents for others.