

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 UNITED STATES POSTAL SERVICE WITNESS
DEAN J. GRANHOLM TO DOUGLAS F. CARLSON INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS (DFC/USPS-T3- 36-42, 45-50, 53)
(May 28, 2010)

The United States Postal Service hereby provides the responses of witness
Dean J. Granholm to the following interrogatories of Douglas F. Carlson, filed on May
10, 2010:

DFC/USPS-T3- 36-42, 45-50, 53

The Postal Service has filed objections to DFC/USPS-T3- 43-44 and 51-52. Each
interrogatory is reprinted below, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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(USPS-T-3) TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T3-36. Please refer to your response to DFC/USPS-T3-4. Please explain where and how the Postal Service provides or otherwise disseminates information about the national service standards for collections and collection times to the public. Your response should include specific locations and methods of communication, such as Internet URL's.

RESPONSE:

Public information concerning national service standards for collections is found in Chapter 3 of the Postal Operations Manual. This manual is available to the public through the Materials Distribution Center at 500 SW Gary Ormsby Drive, Topeka KS 66624-9702 (telephone 800-332-0317). Collection times are posted on each individual collection box.

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DFC/USPS-T3-37. Please refer to your responses to DFC/USPS-T3-32 and DFC/USPS-T3-33. Please confirm that the Postal Service does not have a policy to guide local officials on the classification of a collection box as in a business area or a residential area for the purpose of determining the policy governing the collection times for a particular collection box. If you do not confirm, please provide the policies or guidelines that would apply to classifying the collection boxes described in DFC/USPS-T3-32 and DFC/USPS-T3-33 as in a business area or a residential area.

RESPONSE:

There is no specific policy to direct local officials on the classification of a collection box as business or residential. Guidance is provided through the Postal Operations Manual.

Residential collection boxes are discussed in sections 313.3, 315.32, and section 323, while business boxes are discussed in sections 315.33, and 322.22.

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DFC/USPS-T3-38. Please refer to your response to DFC/USPS-T3-9. Please explain whether local officials may have data that would allow a person to determine, for collection boxes for which local officials have data, the average volume of mail deposited on weekdays in collection boxes not located at a postal facility.

RESPONSE:

Local postal officials might have data for collection boxes on which they performed density tests to determine if these boxes qualified for removal consideration. There is no other requirement for local officials to count daily collection mail data. This information would be specific to each box, and would represent such a small proportion of total collection boxes that it would not be useful to extrapolate average volumes deposited on weekdays in collection boxes not located at a postal facility.

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DFC/USPS-T3-39. Please refer to your response to DFC/USPS-T3-10. Please explain whether local officials may have data that would allow a person to determine, for collection boxes for which local officials have data, the average volume of mail deposited on Saturdays in collection boxes not located at a postal facility.

RESPONSE:

Local postal officials might have data for collection boxes on which they performed density tests to determine if these boxes qualified for removal consideration. There is no other requirement for local officials to count daily collection mail data. This information would be specific to each box, and would represent such a small proportion of total collection boxes that it would not be useful to extrapolate average volumes deposited on Saturdays in collection boxes not located at a postal facility.

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DFC/USPS-T3-40. Please refer to your response to DFC/USPS-T3-11. For each method by which the Postal Service receives outgoing single-piece First-Class Mail from customers on weekdays, please provide, based on your knowledge of postal operations, the approximate percentage or proportion of single-piece First-Class Mail volume that each method contributes. Examples of methods include, but are not limited to, collection boxes, carriers, post office lobby drops, and post office retail windows.

RESPONSE:

There is no requirement for postal officials to count collection mail from the various sources mentioned. Data is not available to determine what percent of the collection mail comes from each category. Lacking such data, this question cannot be answered with a reasonable level of confidence.

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DFC/USPS-T3-41. Please refer to your response to DFC/USPS-T3-12. For each method by which the Postal Service receives outgoing single-piece First-Class Mail from customers on Saturdays, please provide, based on your knowledge of postal operations, the approximate percentage or proportion of single-piece First-Class Mail volume that each method contributes. Examples of methods include, but are not limited to, collection boxes, carriers, post office lobby drops, and post office retail windows.

RESPONSE:

There is no requirement for postal officials to count collection mail from the various sources mentioned. Data is not available to determine what percent of the collection mail comes from each category. Lacking such data, this question cannot be answered with a reasonable level of confidence.

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DFC/USPS-T3-42. Please refer to your response to DFC/USPS-T3-13. Please provide the policy and service standards for collection schedules on weekdays for collection boxes located in “business areas,” as you used the term “business areas” in your response to DFC/USPS-T3-13.

RESPONSE:

Per guidelines in the Postal Operations Manual, section 322, if the business area collection box receives an average of 100 pieces or more per week day or is placed in response to section 322.22 a, that collection box is to be picked up at 5:00 pm or later Monday through Friday, and on Saturday no earlier than 1:00 pm. Other business boxes are picked up based on schedules established locally based on section 313.1 of the POM.

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DFC/USPS-T3-45. Please describe the extent to which you are responsible for policies and practices related to collections and collection times and ensuring that field officials comply with Postal Service policies.

RESPONSE:

The City Delivery department of the Delivery and Post Office Operations office at United States Postal Service headquarters is responsible for formulating policies and standard operating procedures related to city collection service. Compliance to these policies and practices is handled by the management layers established in the field such as Postmasters, District and Area officials. This office deals with collection policy issues, and support as such issues develop.

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DFC/USPS-T3-46. Please refer to your response to DFC/USPS-T3-22. Please confirm that the Postal Service issued an exception to the policy requiring Saturday collections for certain collection boxes located in business areas in response or reaction to a complaint from me about collection boxes in Boise, Idaho, that do not have a Saturday collection. If you do not confirm, please explain.

RESPONSE:

My office cannot confirm that the possible exception offered to the Western Area was in response or in reaction to a complaint from the author. There is no documentation in our files to show the reasoning for the issuing of the possible exception.

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DFC/USPS-T3-47. Please refer to your response to DFC/USPS-T3-25. Please identify and provide the “data analyzed for this response” and explain the types of noncompliance with policy that you discovered.

RESPONSE:

The data analyzed was a real time on-line review of CPMS data and is therefore not available for submission. This review showed random instances of collection boxes located at post offices not complying with POM requirements of a 5:00 pm or later weekday collection.

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DFC/USPS-T3-48. Of the total volume of First-Class Mail collected on weekdays from collection boxes, from lobby drops in postal facilities, and by carriers, please estimate, based on your knowledge or the knowledge of a postal official whom you consult, the proportion or percentage of the total collection volume from the three sources that each source contributes.

RESPONSE:

Mail collected by the carriers includes mail from individual mail boxes and other collection points on their routes. This volume is not segregated nor isolated and counted. Lobby drop mail also includes individual mail pieces handed to retail clerks, which are canceled and placed directly into trays on the counter line. Lobby drop mail is generally dumped into carrier generated hampers. It would be pure speculation to guess the proportion or percentage from each source.

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DFC/USPS-T3-49. Of the total volume of First-Class Mail collected on Saturdays from collection boxes, from lobby drops in postal facilities, and by carriers, please estimate, based on your knowledge or the knowledge of a postal official whom you consult, the proportion or percentage of the total collection volume from the three sources that each source contributes.

RESPONSE:

Mail collected by the carriers includes mail from individual mail boxes and other collection points on their routes. This volume is not segregated nor isolated and counted. Lobby drop mail also includes individual mail pieces handed to retail clerks, which are canceled and placed directly into trays on the counter line. Lobby drop mail is generally dumped into carrier generated hampers. It would be pure speculation to guess the proportion or percentage from each source.

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DFC/USPS-T3-50. Please refer to the response to DFC/USPS-16 in this docket and the responses to DBP/USPS-28, 38, 39, 46, and 47 in Docket No. N2009-1.

a. Please explain whether “excessive distance from the plant,” as the Postal Service used this term in the response to DFC/USPS-16, is an “unforeseen circumstance[]” as the Postal Service used this term in the response to DBP/USPS-46.

b. Please confirm that the response to DFC/USPS-16 more accurately describes Postal Service policy or practice for transporting outgoing First-Class Mail that carriers collect on their routes on Fridays to the processing plant on Fridays than the collective responses to DBP/USPS-28, 38, 39, 46, and 47. If you do not confirm, please explain.

RESPONSE:

[a] We would not classify “excessive distance from the plant” as an “unforeseen circumstance”.

[b] DFC/USPS-16 from this docket reads as follows:

DFC/USPS-16. Please explain whether every piece of outgoing First-Class Mail that carriers collect on their route on a Friday should be dispatched to the processing facility on Friday.

RESPONSE:

Outgoing First-Class Mail that carriers pick up on their route on a Friday is generally dispatched to the processing facility on Friday. There can be local situations that may prevent this from occurring, such as excessive distance from the plant, transportation schedules, and Acts of God such as earthquakes, tornados and hurricanes.

I have been informed that the referenced responses from Docket No. N2009-1, in which I played no role, referred to natural disasters and accidents, but did not mention excessive distance from the plant or transportation schedules. Based on that

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information, the response to DFC/USPS-16 in this docket might be considered a more complete description of the Postal Service's practice.

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DFC/USPS-T3-53. If the Postal Service implemented the plan that it proposes in this docket, would it provide Saturday postmarks for postage-paid, stamped mail that customers present to window clerks along with a request for a Saturday postmark? If so, please explain whether the Postal Service would charge for this service.

RESPONSE:

No