

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

**Six to Five Day Street Delivery)
And Related Service Changes)**

Docket No. N2010-1

**NATIONAL NEWSPAPER ASSOCIATION
INTERROGATORIES TO POSTAL SERVICE WITNESS GRANHOLM
(NNA/USPS T3-1 TO T3-8)
(June 2, 2010)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, National Newspaper Association (NNA) submits interrogatories and requests for documents to United States Postal Service Witness Dean Granholm. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form. NNA respectfully requests that if the witness cannot respond to any interrogatory, the Postal Service will refer the question to a competent witness or provide an institutional response.

Respectfully submitted,

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NNA/USPS T3-1

In its Request of the United States Postal Service for an Advisory Opinion On Changes in the Nature of Postal Service, USPS states on page 12:

“As a courtesy, the Postal Service has provided local firm holdout service to customers, usually businesses, receiving more than 50 mail pieces per day. Local firm holdout policy permits these customers, who usually do not have a Post Office Box, to pick up their mail at delivery unit six days a week in lieu of having it delivered to their street addresses. Even if it were operationally feasible to separate this mail from other street addressed mail at a delivery unit on Saturday, it would not be fair to permit some recipients to pick up such mail on Saturday but to deny the same service on the same day to other recipients of street-addressed mail who also are not receiving delivery to their street addresses.”

- a. Please confirm that firm holdout service is provided free to these customers.
- b. Do recipients of firm holdout service typically receive their mail in this manner every day?
- c. Is it the Postal Service’s intention to eliminate firm holdout service for any day besides Saturday,
 1. If 5 day delivery is adopted?
 2. Whether or not 5 day delivery is adopted?
- d. If your response to part a. is yes, does the Postal Service “separate this mail from other street addressed mail” on a typical non-Saturday? If so, please explain why such separation would be any more infeasible on a Saturday than, say, a Wednesday.
- e. Are “firm holdout” customers the same as “caller service” customers, as defined on lines 23-24, page 3 of your testimony.
- f. If firm holdout customers typically have more than 50 mail pieces per day and the PO boxes available at the customer’s post office do not accommodate that volume, what options will be extended to the customer?
- g. If a given Post Office has insufficient PO Box inventory to convert all firm-holdout customers to paid PO boxes, will PO box distribution on Saturdays be discontinued at that Post Office on grounds that it is not “fair” for some recipients to get mail while others do not?

NNA/USPS T3-2

On p 4 of your testimony, you say that “Large Mailers” that drop ship mail will be able to continue to enter mail at Post Offices on Saturdays.

- a. Please define “Large Mailers.”
- b. Will a mailer with volumes considered “large” when measured on a scale of an individual Post Office’s volumes be considered a “Large Mailer?”
- c. Will a mailer’s history of mail entry on Saturdays be a factor in considering whether the mailer will be permitted to enter mail on Saturdays?
- d. Please provide a copy of DM-109 5-5.1 for the record and explain how the elimination of Saturday service is expected to affect this policy.

NNA/USPS T3-3

On p 4 of your testimony you state that eliminating Saturday delivery will not require additional vehicles, casing equipment or facility space. Later in your testimony, you state your belief that some mail will shift to Fridays for in-home delivery by the weekend and the rest will be delivered on Monday, and finally on p. 11 you state that mail shifting to “other weekdays” should have only a small effect on a route’s average weekly street hours. You then analyze the effect of the deferred mail delivery upon Monday work hours.

- a. Has the Postal Service conducted any studies to determine which percentage of Saturday mail will shift to Fridays or any other work day, rather than Mondays? If so, please provide a copy of the study or studies.
- b. If volume shifting to Fridays were to lead to a potential of increased cost in vehicles, casing equipment, facility space or other cost-drivers, would local supervisors have the option of deferring non-committed mail to Mondays, or later?
- c. If volume shifting to Fridays could not be deferred without violating service standards, would additional costs for Friday processing and delivery be likely?
- d. Does the Postal Service find that there is greater or lesser excess capacity of available workhours, vehicles, casing equipment or facility space on Tuesdays, Wednesdays, Thursdays or Fridays than on Saturdays? Please explain your response.
- e. Has the Postal Service conducted any studies of newspaper Periodicals class mailers that now mail on Saturdays to determine whether they will switch to Fridays, Mondays or any other day when delivery is provided. Is so, please provide the study or studies. If not, please explain why not.

NNA/USPS T3-4

You state that some labor to be eliminated consists of “lower wage” Leave Replacement employees on rural delivery routes. Please provide documentation of the difference(s) in compensation levels between Leave Replacement employees and regular rural letter carriers.

NNA/USPS T3-5

Please confirm that Within County Periodicals mail that is entered at carrier-route, walk sequenced rates does not necessarily have to be manually sorted and that this mail can be carried by city carriers in a firm bundle or by rural carriers on motor routes without manual sorting by the carrier. If you do not confirm, please explain why you do not.

NNA/USPS T3-6

On p 12 you discuss some route adjustments that may be needed for rural carriers' routes.

- a. Does a “territorial” cut for a K route mean that the route may become shorter, covering fewer miles?
- b. If routes must be cut to make them fit into 8 hours daily, will additional routes be added in those territories? If so, please provide an estimate of how many routes will be added.
- c. Please confirm that the route adjustments discussed in this section are the subject of contractual agreements and that USPS does not at this date know whether the contractual adjustments will be agreed to by Rural Letter carriers. If you do not confirm, please explain why. If you do confirm, please explain how you have analyzed route cost savings without knowing the constraints of potential contracts.
- d. Please confirm that your reference to “higher” wages in line 3 or page 13 refers to the wages of city carriers, and not carrier technicians.

NNA/USPS T3-7

On p 14 you say local post office management may need to add retail hours if postal patrons create an increase in lobby traffic in Saturday, in order to achieve Wait Time in Line goals of 5 minutes or less. Has any estimate of the additional retail hour cost been provided in this docket? If so, please cite it.

NNA/USPS T3-8

You discuss the effect of automation upon workload peaks on p. 15.

- a. What percentage of letter mail is currently delivery-point sequenced through automation?

- b. Please provide estimates of the additional percentage gains in delivery-point sequenced letter mail that Postal Service expects to achieve in the next three years.
- c. Please confirm that the Postal Service's current plans for Flats Sequencing Systems for flat mail predict that around 35 percent of flats will be handled by FSS. If you do not confirm, please provide the correct estimate.