

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
REDIRECTED FROM WITNESS PULCRANO
(PR/USPS-T1-7 THROUGH T1-9)
(June 4, 2010)

The United States Postal Service hereby provides institutional responses 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. The responses to

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
June 4, 2010

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

PR/USPS-T1-7

Please identify with specificity when and under what circumstances the Postal Service asked Congress “earlier this year” [prior to the focus group sessions referred to in witness Elmore-Yalch’s testimony] to approve a reduction in service to five days a week and provide any related documents, including draft or proposed legislation or other supporting material.

RESPONSE

The Postal Service has routinely responded to the annual inclusion of appropriations legislation language requiring 1983 service levels by requesting that such language be removed, since the removal of such language would permit the Postal Service to exercise its authority to change the current six-day delivery model. Page 5 of the document attached to the institutional response to NALC/USPS-T1-2 contains a Postal Service request (March 2009) made prior to witness Elmore-Yalch’s focus group sessions.

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

PR/USPS-T1-8

If not provided in response to other interrogatories in this set, please clarify for the record the precise type or scope of legislative change the Postal Service is asking for from Congress in connection with the anticipated delivery frequency change, per the statement in the focus group moderators' materials referred to in witness Elmore-Yalch's testimony, including whether the Postal Service is seeking several alternatives to the existing provision. For example, is the Postal Service asking Congress to reword the existing legislative restriction to strictly conform to a five-day "no Saturday" street delivery model (in keeping with the caption of the instant docket), is it seeking complete elimination of the existing legislation provision, or is it seeking some other formulation of the existing legislative provision?

RESPONSE

See the response to PR/USPS-T1-7. The Postal Service prefers that Congress not enact legislation in any form (such as annually recurring appropriations bill riders requiring 1983 service levels) that limit the exercise of its broad authority to determine how to fulfill its service mandate inherent in title 39, United States Code. The Postal Service recognizes that the legislative process is complex and dynamic. Therefore, the Postal Service is flexible about how Congress may ultimately exercise such restraint or otherwise refrain from prohibiting implementation of its plan to eliminate Saturday street delivery. Whenever it is invited to do so during the current legislative process, the Postal Service will offer its views to Congress regarding any specific legislative formulation – in whatever form it may take -- relevant to its five-day delivery plan.

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

PR/USPS-T1-9

At USPS-T1 at 5 through 8, you generally note that the Postal Service has considered “stakeholder concerns.” Stakeholders are broadly categorized as senders and receivers, so policy makers are not included. If not addressed in a response to other interrogatories in this set of interrogatories, please describe in detail how the Postal Service has addressed or is addressing Congressional concerns about the proposal, including those expressed at recent Congressional hearings, and any plans it has for informing the Congress about post-implementation impact, if the proposal is implemented largely as proposed.

RESPONSE

In response to the national legislature’s exercise of its responsibilities, the Postal Service responds on an ongoing basis to formal and informal inquiries about postal matters, including the five-day plan, from individual members of Congress, House and Senate committees and subcommittees, and Congressional staff.

The Postal Service intends to fulfill any future obligations for five-day post-implementation reporting to Congress which that body may impose in the exercise of its oversight responsibilities.