

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 INTERROGATORIES OF THE NATIONAL ASSOCIATION
OF LETTER CARRIERS, AFL-CIO (NALC/USPS-T3- 1-18)
(June 8, 2010)

The United States Postal Service hereby provides the responses of witness
Dean J. Granholm to the following interrogatories of the National Association of Letter
Carriers, AFL-CIO, filed on May 25, 2010:

NALC/USPS-T3- 1-18

Each interrogatory is reprinted below, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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Docket No. N2010-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
 DEAN J, GRANHOLM (USPS-T-3) TO INTERROGATORY OF THE NATIONAL
 ASSOCIATION OF LETTER CARRIERS, AFL-CIO

NALC/USPS-T3-1

Provide the same categories of data listed on Table 2 on page 4 of USPS-LRN2010-1/3 (i.e., average volume, average office hours and average street hours) broken out separately as between FY2008 and FY2009.

RESPONSE:

FY2008	
	Tuesday After Monday Holiday
	Normal Tuesday
Avg. Office Hours	381,378
Avg. Street Hours	948,815
Avg. Total Volume	396,444,099

FY2009	
	Tuesday After Monday Holiday
	Normal Tuesday
Avg. Office Hours	333,582
Avg. Street Hours	927,953
Avg. Total Volume	331,953,952

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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NALC/USPS-T3-2

Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Wednesday and each Wednesday following a Monday holiday in FY 2008 and FY 2009.

RESPONSE:

FY2008

	Normal Wednesday	Wednesday After Monday Holiday
Avg. Office Hours	378,437	419,765
Avg. Street Hours	946,437	960,750
Avg. Total Volume	410,776,267	445,185,901

FY2009

	Normal Wednesday	Wednesday After Monday Holiday
Avg. Office Hours	378,437	406,368
Avg. Street Hours	946,437	948,212
Avg. Total Volume	410,776,267	423,519,008

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NALC/USPS-T3-3

Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Thursday and each Thursday following a Monday holiday in FY 2008 and FY 2009.

RESPONSE:

FY2008

	Normal Thursday	Thursday After Monday Holiday
Avg. Office Hours	375,269	406,368
Avg. Street Hours	934,002	948,212
Avg. Total Volume	387,726,500	423,519,008

FY2009

	Normal Thursday	Thursday After Monday Holiday
Avg. Office Hours	333,646	345,736
Avg. Street Hours	914,910	924,157
Avg. Total Volume	339,629,864	347,273,232

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NALC/USPS-T3-4

Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Friday and each Friday following a Monday holiday in FY 2008 and FY 2009.

RESPONSE:

FY2008

	Normal Friday	Friday After Monday Holiday
Avg. Office Hours	376,124	398,067
Avg. Street Hours	927,336	936,433
Avg. Total Volume	392,981,770	416,432,905

FY2009

	Normal Friday	Friday After Monday Holiday
Avg. Office Hours	336,090	342,013
Avg. Street Hours	908,211	914,492
Avg. Total Volume	345,928,485	350,604,657

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DEAN J, GRANHOLM (USPS-T-3) TO INTERROGATORY OF THE NATIONAL
ASSOCIATION OF LETTER CARRIERS, AFL-CIO

NALC/USPS-T3-5

Provide the overtime hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2008.

RESPONSE:

FY2008 Overtime Hours	
Normal Tuesday	Tuesday After Monday Holiday
5,573,083	1,658,824

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NALC/USPS-T3-6

Provide the overtime hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2009.

RESPONSE:

FY2009 Overtime Hours	
Normal Tuesday	Tuesday After Monday Holiday
4,309,685	1,056,121

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NALC/USPS-T3-7

Provide auxiliary assistance hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2008.

RESPONSE:

FY2008 Aux. Assistance Hours

Normal Tuesday	Tuesday After Monday Holiday
2,801,839	406,670

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NALC/USPS-T3-8

Provide auxiliary assistance hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2009.

RESPONSE:

FY2009 Aux. Assistance Hours

Normal Tuesday	Tuesday After Monday Holiday
2,990,173	345,417

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NALC/USPS-T3-9

Provide the “average volume” (as that term is used on Table 2 of USPS-LRN2010-1/3) for each day of the week (i.e., Mondays, Tuesdays, etc.), provided separately for FY 2008, FY 2009 and, to the extent available, FY 2010.

RESPONSE:

The following table provides the requested averages. The daily averages are based upon the total number of delivery service days per year for each day of the week.

Year	Day	Average Total Volume	Number of Days
2008	Mon	489,086,918	47
	Tue	425,430,935	51
	Wed	414,746,609	52
	Thu	391,937,383	51
	Fri	395,740,727	51
	Sat	386,141,421	52
2009	Mon	428,907,366	47
	Tue	352,188,688	51
	Wed	338,661,815	53
	Thu	340,409,800	49
	Fri	346,378,117	52
	Sat	328,799,203	51
2010	Mon	438,271,449	22
	Tue	369,772,011	25
	Wed	338,281,049	24
	Thu	352,994,534	25
	Fri	348,142,330	23
	Sat	335,359,680	25

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NALC/USPS-T3-10

Provide, separately for FY 2008, FY 2009 and FY 2010, the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for the Tuesday following Martin Luther Kings's Day and the Tuesday following Presidents Day.

RESPONSE:

2008

	Avg. Office Hours	Avg. Street Hours	Avg. Total Volume
MLK Day	482,230	1,034,541	677,895,270
President's Day	471,054	1,026,261	648,225,595

2009

	Avg. Office Hours	Avg. Street Hours	Avg. Total Volume
MLK Day	418,796	1,007,076	583,064,457
President's Day	404,165	978,923	534,151,874

2010

	Avg. Office Hours	Avg. Street Hours	Avg. Total Volume
MLK Day	379,009	995,669	573,160,435
President's Day	369,484	990,219	520,543,578

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DEAN J, GRANHOLM (USPS-T-3) TO INTERROGATORY OF THE NATIONAL
ASSOCIATION OF LETTER CARRIERS, AFL-CIO

NALC/USPS-T3-11

Provide auxiliary assistance hours provided to letter carriers, broken out separately for each quarter in FY 2008, FY 2009 and FY 2010.

RESPONSE:

Auxiliary assistance hours are available by month, not quarter, and are presented in that way, on the following page, for FY2008, FY2009, and what is available for FY2010.

(continued)

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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Response to NALC/USPS-T3-11 (continued)

	Month	Auxiliary Assistance Hours
2008	Oct	1,525,667
	Nov	1,451,473
	Dec	1,382,846
	Jan	1,468,553
	Feb	1,494,205
	Mar	1,641,034
	Apr	1,629,766
	May	1,685,097
	Jun	1,762,733
	Jul	1,914,344
	Aug	1,892,550
	Sep	1,621,480
2009	Oct	1,684,586
	Nov	1,468,283
	Dec	1,570,318
	Jan	1,592,798
	Feb	1,518,708
	Mar	1,727,695
	Apr	1,770,354
	May	1,780,833
	Jun	2,007,202
	Jul	2,041,525
	Aug	1,871,038
	Sep	1,478,900
2010	Oct	1,447,843
	Nov	1,279,675
	Dec	1,339,888
	Jan	1,324,796
	Feb	1,284,952
	Mar	1,238,928

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NALC/USPS-T3-12

On page 11, line 16 of your testimony, you state that “During 2009, City carriers’ daily average per route was less than eight work hours.” Provide, separately for FY 2006, FY 2007, FY 2008, FY 2009 and, to the extent available, for FY 2010, city carriers’ daily average work hours per route.

RESPONSE:

Fiscal Year	City Carriers Average Hours/Route
FY2006	8.38
FY2007	8.32
FY2008	7.99
FY2009	7.85
FY2010	8.03

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NALC/USPS-T3-13

USPS-LR-N2010-1/3 states at page 2 that “City routes averaged 7.55 hours on Saturdays during August and September of 2009.” Provide average hours for city routes for all days of the week combined for each quarter of FY 2008, FY 2009 and FY 2010, stated separately for each quarter.

RESPONSE:

Time Period	City Carriers Average Hours/Route
FY2008 Q1	8.43
FY2008 Q2	8.10
FY2008 Q3	7.76
FY2008 Q4	7.81
FY2009 Q1	8.16
FY2009 Q2	7.92
FY2009 Q3	7.62
FY2009 Q4	7.79
FY2010 Q1	8.18
FY2010 Q2	8.02

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NALC/USPS-T3-14

Provide the total number of city delivery routes for each quarter in FY 2008, FY 2009 and FY 2010 (to the extent FY 2010 data is available), stated separately for each quarter.

RESPONSE:

Time Period	City Routes
FY2008 Q1	163,320
FY2008 Q2	163,249
FY2008 Q3	162,657
FY2008 Q4	162,075
FY2009 Q1	161,542
FY2009 Q2	159,980
FY2009 Q3	158,144
FY2009 Q4	157,382
FY2010 Q1	150,786
FY2010 Q2	150,596
FY2010 Q3	151,140

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NALC/USPS-T3-15

Provide the total number of delivery points on all city delivery routes combined for each quarter in FY 2008, FY 2009 and FY 2010 (to the extent FY 2010 data is available), stated separately for each quarter.

RESPONSE:

Time Period	City Delivery Points
FY2008 Q1	86,880,556
FY2008 Q2	86,981,049
FY2008 Q3	87,070,473
FY2008 Q4	87,164,245
FY2009 Q1	87,284,877
FY2009 Q2	87,392,147
FY2009 Q3	87,469,431
FY2009 Q4	87,567,654
FY2010 Q1	87,673,060
FY2010 Q2	87,779,299
FY2010 Q3	87,850,934

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NALC/USPS-T3-16

You state at page 5, line 17 of your testimony that “delivery supervisors will likely defer non-committed mail for delivery on Tuesday.” Do you have an estimate of how much mail will be deferred to Tuesday? If so, provide the estimate. Do you have an estimate of how much non-committed mail will be deferred to days other than Tuesdays? If so, provide the estimate.

RESPONSE:

I have not prepared an estimate of how much non-committed mail will be curtailed in a 5-day environment. The Postal Service does not track curtailments nationally. The amount of mail curtailed will depend on local operational conditions. To remain consistent with the current service standards, the Postal Service could not curtail mail for more than one calendar day.

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NALC/USPS-T3-17

You state at page 5 of your testimony that increased mail volume on Fridays, Mondays and Tuesdays are possibly expected to lead to increased work hours in the form of overtime and/or auxiliary assistance. Do you have an estimate of how much such overtime and/or auxiliary assistance hours may increase and how much that might cost USPS? If so, provide the estimate.

RESPONSE:

I have not prepared an estimate of how much overtime and/or auxiliary assistance hours may increase in a 5-day environment. The amount of overtime and/or auxiliary assistance utilized will depend on local operational conditions.

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NALC/USPS-T3-18

State how many new city delivery routes you believe USPS would have to create as a result of its elimination of Saturday delivery. Provide the data and analysis for your response.

RESPONSE:

I have not made any such estimate. There is no plan to create new City routes as a result of eliminating Saturday delivery.