

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Six-Day to Five-Day Street Delivery  
and Related Service Changes

Docket No. N2010-1

Public Representatives' Interrogatories  
to United States Postal Service Witness Pulcrano  
(PR/USPS-T1-14 through 24)

(June 8, 2010)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission's Rules of Practice, the Public Representatives hereby submit the following interrogatories and requests for production of documents to Postal Service witness Pulcrano. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions set out in the Appendix to the Public Representatives' Interrogatories first set of interrogatories directed to witness Pulcrano are incorporated by reference.

Respectfully Submitted,  
/s/ Patricia Gallagher

Kenneth R. Moeller  
Lawrence E. Fenster

Public Representative Team  
Docket No. N2010-1  
901 New York Avenue NW Suite 200  
Washington, DC 20268-0001

*Fax (for all):* (202) 789-6891

*Other contact information:*

pat.gallagher@prc.gov 202-789-6824  
kenneth.moeller@prc.gov 202-789-6888  
lawrence.fenster@prc.gov 202-789-6862

#### **PR/USPS-T1-14**

Under the Postal Service's plan, please describe in detail the typical processing that a properly addressed and stamped piece of First-Class Mail will undergo after being presented by a customer at a window counter at a post office that is open on Saturday. For purposes of your response, please assume that the customer does not request a hand-applied postmark or cancellation or purchase any ancillary services. Further assume that the subject piece is properly addressed and carries the correct amount of postage.

#### **PR/USPS-T1-15**

Under the Postal Service's plan, will a customer's request for a hand-applied postmark or cancellation cause there to be any difference in processing, relative to that accorded the type of piece described in **PR/USPS-T1-14**, other than application of the postmark or cancellation?

#### **PR/USPS-T1-16**

If not addressed in the responses to **PR/USPS-T1-14** and **PR/USPS-T1-15**, please describe where Single-Piece First-Class Mail typically will be physically lodged from the time of presentation by a customer at a post office window counter from Saturday until Monday (or Tuesday, if Monday is a federal holiday). For purposes of your response, please assume that the subject mail is properly addressed and carries the correct amount of postage and indicate whether the presence or absence of a hand-applied postmark or cancellation makes any difference.

#### **PR/USPS-T1-17**

Please address the type of security that will be provided for Single-Piece First-Class Mail presented at a post office window counter on a Saturday, including whether the type and level of security is expected to differ relative to current practice for similar mail in similar situations, such as over three-day weekends in the existing operating environment.

**PR/USPS-T1-18**

You state, in connection with the Optional Saturday processing plan discussed at USPS-T1 at 15-16, that “initiation of processing” for local outgoing and incoming Sectional Center Facility mail entered on Saturday will be available for those who meet three stated requirements. Please describe in detail the steps or activities included in your reference to “initiation of processing.” For purposes of your response, if more than one possibility exists, please provide several representative examples.

**PR/USPS-T1-19**

If not covered in your response to **PR/USPS-T1-18**, please address where mail processed under the Optional Saturday plan typically will be physically lodged once all steps or activities covered by “initiation of processing” are concluded. For purposes of your response, if more than possibility exists, please provide several representative examples.

**PR/USPS-T1-20**

Has the Postal Service developed an estimate or formed an expectation about the level of participation in the bulk mail Optional Saturday processing plan in terms of number of bulk mail permit holders, by class of mail, and/or related volume, either in terms of a “back of the envelope” calculation or a more formal estimate?

**PR/USPS-T1-21**

Does the Postal Service anticipate a need for any additional security or changes in security plans for bulk mailings presented under the Optional Saturday processing plan?

**PR/USPS-T1-22**

Under the Postal Service's plan, assuming similar types of commercial bulk mailings are involved, please state whether (and how) local outgoing and incoming Sectional Center Facility processing of commercial bulk mailings entered on Fridays by or before the Critical Entry Time is expected to differ from the "initiation of processing" for qualifying commercial bulk mailings entered under the proposed Optional Saturday processing plan.

**PR/USPS-T1-23**

Please provide the number of National Firm Holdout accounts for the most recently available fiscal year.

**PR/USPS-T1-24**

If the Postal Service's plan is approved essentially as proposed, does the Postal Service expect the number of National Firm Holdout accounts to increase solely because of the adoption/implementation of the plan?