

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

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**SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010**

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**Docket No. N2010-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS DEAN J. GRANHOLM  
(APWU/USPS-T3-9-11)  
(June 9, 2010)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Gregory M. Whiteman (USPS-T-9). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Joseph Corbett (APWU/USPS-T2-1-6), filed on April 23, 2010, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T3-9 In your response to APWU/USPS-T3-3 you indicated that the preferred solution to increased workload on Fridays, Mondays and Tuesdays would be curtailment of non-committed mail. Several comments by customers in the Appendix of USPS Library Reference N2010-1/1 indicated that they could make adjustments to 5-day delivery as long as the Postal Service could get their time sensitive mail delivered on Friday. This appears to set up a situation where the Postal Service's planned response to workload changes resulting from 5-day delivery are in conflict with the expectations of the customers. Please detail the plans the Postal Service has made to resolve this mismatch.

APWU/USPS-T3-10 In your response to APWU/USPS-T3-8 you state that the vacancy rates for PO Boxes is the same or higher for possible closure offices than it is nationally. This seems to indicate that post offices with less than a 37 percent vacancy rate will be the ones where the Postal Service is both trying to accommodate patrons with PO boxes in stations/branches scheduled for closure AND accommodate increased demands for PO boxes from businesses requiring PO boxes when Saturday delivery of their holdout mail is discontinued.

- a). Why hasn't the Postal Service done an evaluation of the potential conflicts of these two programs?
- b). The Postal Service in Docket No. MC2010-20 is requesting that some PO box service be moved to the competitive products list. While the proposal in this case is for a relatively small number of PO boxes, is the Postal Service considering moving a larger number of PO boxes into the competitive products category? If so, what percentage of PO boxes might be impacted by that plan and what would be the time frame of such a change?

APWU/USPS-T3-11 In your response to APWU/USPS-T3-2(b) you indicate that mail may only be curtailed for one business day yet in response to NALC/USPS-T3-16 you state that the "Postal Service could not curtail mail for more than one calendar day." Please explain this inconsistency and identify the correct amount of time mail may be curtailed.