

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

**Six-Day to Five-Day Street Delivery
and Related Service Changes, 2010**

Docket No. N2010-1

**DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS DEAN J. GRANHOLM (DFC/USPS-T3-54-57)**

June 9, 2010

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Dean J. Granholm.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Granholm (DFC/USPS-T3-1-8) are incorporated herein by reference.

Respectfully submitted,

Dated: June 9, 2010

DOUGLAS F. CARLSON

DFC/USPS-T3-54. Please refer to your responses to DFC/USPS-T3-38 and 42. Please confirm that the Postal Service does not require local officials or any other postal officials to measure the volume of mail that street collection boxes under the jurisdiction of city-delivery offices collect to ensure that collection boxes that receive a weekday average of 100 pieces of mail or more have a weekday collection time at 5:00 PM or later pursuant to POM § 322.1. If you do not confirm, please explain.

DFC/USPS-T3-55. Please refer to your response to DFC/USPS-T3-38. Please confirm that the requirement in POM § 313(d) to “[r]eview operation continually to make modifications as justified by changed conditions” does not include a requirement to measure volume in collection boxes. If you do not confirm, please explain.

DFC/USPS-T3-56. Please refer to your response to DFC/USPS-T3-46. Please consult with officials familiar with the situation and explain why the Postal Service issued an exception to the policy requiring Saturday collections for certain collection boxes located in business areas. In your explanation, please identify the reasons why the issue arose for consideration and decision.

DFC/USPS-T3-57. Please estimate the number of post offices at which mail that carriers collect on their routes is not routinely or consistently dispatched to the processing plant on the same day as the carriers collect the mail due primarily to the distance of the post office from the processing plant.