

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 DOUGLAS F. CARLSON INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS (DFC/USPS-T3- 54-57)
(June 23, 2010)

The United States Postal Service hereby provides the responses of witness
Dean J. Granholm to the following interrogatories of Douglas F. Carlson, filed on June
9, 2010:

DFC/USPS-T3- 54-57

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DEAN J, GRANHOLM
(USPS-T-3) TO INTERROGATORY OF 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.

RESPONSE:

While the Postal Service does not require local officials to conduct periodic collection box density checks on a scheduled basis, such tests are nonetheless often performed to ensure that proper service levels are being provided.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DEAN J, GRANHOLM
(USPS-T-3) TO INTERROGATORY OF DOUGLAS F. CARLSON

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.

RESPONSE:

While there is no specific requirement to measure volume, a density check is a tool frequently utilized in reviewing collection operations. For instance, all collection routes are required to be reviewed once a year by a manager. This review includes an estimate of the amount of mail in each box on that one day. Per Section 234.3 of the M-39 Handbook, *Management of Delivery Services*, based on this review, local management determines whether to make changes. This requirement could result in to conducting a density check as appropriate.

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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.

RESPONSE:

Various postal managers in the Western Area raised concerns regarding the cost of collection of empty, or near empty, collection boxes due to the dramatic decline in mail volume. The exception policy put forth to the Western Area was an attempt to restrict changes in collection service to specific collection boxes where current data would show and justify the change in service.

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(USPS-T-3) TO INTERROGATORY OF DOUGLAS F. CARLSON

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.

RESPONSE:

There are no data to support an estimate of these situations, however carrier schedules are generally created to allow for carrier return mail to connect up with available transportation to the plant.