

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

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

Docket No. N2010-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO GCA INTERROGATORIES GCA/USPS-T6-1, 3, AND 12, REDIRECTED
FROM WITNESS BRADLEY
(June 22, 2010)

The United States Postal Service hereby provides its response to the following interrogatories of GCA, filed on June 8, 2010: GCA/USPS-T6-1, 3, and 12 (redirected from witness Bradley). Each interrogatory is stated verbatim and is followed by the response.

UNITED STATES POSTAL SERVICE

By its attorney:

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June 22, 2010

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO GCA
INTERROGATORIES, REDIRECTED FROM WITNESS BRADLEY**

GCA/USPS-T6-1.

In LR-1/6, please refer to the table labeled "FY2009, Results of Eliminating Saturday Delivery Operational Approach." Please provide a full breakdown of the type of labor (i.e. FTR, TE, etc.) for the following cells:

- a. All cells for the rows labeled "6-Day M-F Hours" and "6-Day Saturday Hours"
- b. All cells for the rows labeled "5-Day M-F Hours" and "5-Day Saturday Hours"
- c. All cells in the row "Hour Saved"
- d. In the column labeled "C/S7 City Deliver Carriers-Street Activity", for the first three cells under the label "Total City Hours"
- e. In the column labeled "C/S 10 Rural Carriers," for the first three cells under the label "Total Rural Hours."

RESPONSE:

a-e. The only information on workhours available by type of labor for city and rural carriers is provided by witness Colvin, USPS-T-7, Attachment 1, page 2. There is no information available by the categories (e.g., in-office direct labor) contained in the 8 columns associated with the specified rows for parts a-c. The information available on Attachment 1, page 2 is responsive to the requests in part d and e, related to the current 6-day delivery environment. This same information is not available for the 5-day delivery workhour estimates.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO GCA
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GCA/USPS-T6-3.

- a. In LR-1/6 in the table labeled “Calculating City Hours Saved Under 5 Day Delivery,” please provide your best estimates of the proportion of the saved Saturday hours which affects consumers and of the proportion which affects businesses. For purposes of making such estimates, please consider “consumers” and “businesses” separately under two descriptions: (i) as senders of mail, and (ii) as recipients of mail.
- b. Please provide estimates similar to those requested in (a), but for Single-Piece First-Class mail in place of “consumers” and for workshared First-Class Mail and Standard Mail in place of “businesses.”

RESPONSE:

a.-b. The Postal Service does not have any estimates of the proportions of Saturday hours saved that can be said to “affect” consumers, businesses, senders of mail, recipients of mail, classes or subclasses, and does not even have any clear conceptualization of how they might be estimated. In a general sense, all customers of the Postal Service will benefit from any savings obtained through five-day delivery or other programs – since all our customers depend on the financial viability of the Postal Service.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO GCA
INTERROGATORIES, REDIRECTED FROM WITNESS BRADLEY**

GCA/USPS-T6-12.

In the table on page 51 of your testimony, please disaggregate “Service Wide” total indirect savings of \$318,567 (City) and \$59,496 (Rural) into their component detailed categories.

RESPONSE:

Page 51 of Prof. Bradley’s testimony, USPS-T-6, contains a detailed breakdown of the five-day savings of indirect carrier costs of \$318,567 (City) and \$59,496 (Rural).

Provided below is a further splitting of the carrier-related savings of service-wide benefits by component, which appears to be what is sought. These are the same components as shown in Table 1 of the testimony of Dr. Colvin, USPS-T-7 at page 8.

Five-Day Savings of Service Wide Benefits for Carriers by Component (000s)		
	City	Rural
Repriced Annual Leave	\$ 6,602	\$ 1,156
Holiday Leave Adjustment	\$ (1,152)	\$ (202)
Workers Comp Current Year	\$ 34,869	\$ 6,104
Unemployment Compensation	\$ 6,460	\$ 1,131
Annuitant Health Benefits - Earned (Current)	\$ 115,145	\$ 20,157
Civil Service Retirement System (CSRS) -- Earned	\$ 51,124	\$ 8,950
Annuitant Life Insurance	\$ 591	\$ 104
Total Service-Wide Benefits	\$ 213,640	\$ 37,399

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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