

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

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION
(NNA/USPS-T4-1 through 6)

The United States Postal Service hereby provides the responses of witness Frank Neri to the following interrogatories of the National Newspaper Association dated June 7, 2010: NNA/USPS-T4-1 through 6. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 24, 2010

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-1

Please confirm that newspaper Periodicals origin entered mail dropped at a BMEU on Saturday will be processed in outgoing sortations on Monday.

RESPONSE

Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-2

Is it your expectation that incoming primary operations for the newspaper mail referred to in T4-1 will be worked as follows:

For zones 1-2, on Tuesday
For zones 2-4, on Wednesday
For remaining zones on Thursday or later

If you do not confirm, please state your expectations.

RESPONSE

Any newspaper Periodical mail origin entered on a Saturday through the BMEU will be processed, dispatched, and sorted for delivery based upon the appropriate service charts as if the mail had been entered on Monday.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-3

How many FSM 1000 machines are currently in operation in processing plants or delivery offices?

RESPONSE

As of May 30, 2010, there were 136 FSM 1000 machines in operation in processing plants and delivery offices.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-4

Do you believe that a greater aggregation of incoming mail for Monday processing could result in greater use of FSM 1000 machines, if any remain operational?

RESPONSE

No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-5

If a significant amount of mailer behavior shifts mail from Saturday entry to Monday, rather than to Friday, how would that affect processing operations plans?

RESPONSE

We would adjust processing plans to match the workload.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T4-6

If a significant amount of mail shifts from Saturday entry to any day other than Friday, which you state permits the use of excess capacity on Monday, will your projections for cost savings change? If so, please describe any contingency calculations you have made to address the possibility for an unpredicted mail entry change.

RESPONSE

Yes, the projections for cost savings would change. However, contingency calculations were not needed, given that the deviation in productivity by day is not significant.