

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 THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-T4-1 through 8)

The United States Postal Service hereby provides the responses of witness Frank Neri to the following interrogatories of the American Postal Workers Union dated June 9, 2010: APWU/USPS-T4-1 through 8. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-1

On page 13, lines 17-18 of your testimony you state that “currently, most processing facilities have the greatest available capacity on Monday night for Tuesday delivery.” Which day of the week do most processing facilities have the least excess capacity?

RESPONSE

Most processing facilities have their least excess capacity on Friday.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-2

On page 14, lines 5-7 of your testimony you state that the Postal Service currently has adequate capacity to be able to dispatch increased mail volume to delivery units in time for delivery on Friday. Is there also have [sic] enough capacity to cover the increased demand for slots for Thursday drops to the processing facilities by mailers? If the demand for such slots exceeds the supply, how will it be determined which mailer gets a slot?

RESPONSE

Yes. If demand were to exceed the supply of slots, slots would be assigned based upon the sequence of order in which they are requested.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-3

You indicate on page 9, line 1-3 of your testimony that support of the delivery of PO box mail on Saturdays will require modifications to the distribution software and method changes. Are those changes underway? If not, when would you plan to begin making and testing software changes?

RESPONSE

Yes. Testing was conducted and the results were successful.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-4

Will the changes in mail processing procedures require increased storage space? If so, will that increase mostly be at the plant, the delivery unit or in transportation trailers?

RESPONSE

There is no anticipated need for increased storage space.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-5

What is the Postal Service's current best practice if mail volume exceeds the ability to process it on a given day? Please describe which mail, if any, is held for processing the next day. Please describe which mail, if any, might be sent to the delivery unit for sorting.

RESPONSE

If mail volume exceeds the ability to process it on a given day, we redirect resources and schedule the existing equipment to meet the increased volume. This may include the use of overtime and flexible employees within contracted limits. If it is necessary to hold some mail for processing the next day, we choose to hold standard mail. No mail is sent to the delivery unit for sorting.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-6

On page 17 of your testimony you indicate that additional workhours will be needed to isolate PO box mail at the processing plants for Saturday delivery. Will those additional hours be needed on Fridays?

RESPONSE

The additional hours will be needed either on Friday or Saturday, based on site-specific variables.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T4-7

On page 12 of your testimony you indicate that you are modeling operations at each processing facility location to determine any changes that may be necessary to facilitate five-day delivery.

- a) When will that modeling be completed?
- b) Will the Postal Service provide a summary of its findings to the Postal Regulatory Commission?
- c) Are anticipated 5-day delivery workload changes being factored in to any AMP studies underway? Have or will anticipated 5-day delivery workload changes be evaluated in approved, but not yet implemented AMP consolidations? If not, why not?

RESPONSE

- a) Initial modeling efforts are anticipated to be completed during the summer of 2010.
- b) We will fulfill any outstanding obligation to the PRC during this proceeding.
- c) Anticipated 5-day delivery workload changes are not being factored into any AMP studies currently underway. They have not been evaluated in approved but not yet implemented AMP consolidations. When an implementation date for 5-day delivery is established, 5-day delivery workloads will be factored into AMP consolidations.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
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APWU/USPS-T4-8

What, if any changes will be made to critical entry times or clearance times as a result of the changes in mail processing operations?

RESPONSE

No Critical Entry Time changes are anticipated at this time. We are currently evaluating impacts to Clearance Times.