

**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

**FOLLOW-UP INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS SAMUEL PULCRANO
(APWU/USPS-T1-10-14)
July 6, 2010**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following follow-up interrogatories to United States Postal Service witness Samuel Pulcrano (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Joseph Corbett (APWU/USPS-T2-1-6), filed on April 23, 2010, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-10 In response to APWU/USPS-T1-2 you state that you are in charge of “coordinating the development of detailed implementation plans” but that those plans are “contingent upon developments.”

- a.) Have you received any directives or other instructions for what should be included in the implementation plans?
- b.) Have you received any guidelines or other instructions for creating the implementation plans?
- c.) Provide examples of the developments that would affect the implementation plans.

APWU/USPS-T1-11 Please refer to your response to APWU/USPS-T1-6(d). Are detached mail units operated by postal employees? If not, please identify who operates these facilities.

APWU/USPS-T1-12 In response to APWU/USPS-T1-6(d) you state that analysis is being conducted of “Processing & Distribution Center capacity to determine whether it may be necessary to move processing equipment to some P&DCs and anticipates there will be very few such PD&Cs (sic).”

- a.) Describe what is involved in this analysis and provide any documents related to this analysis.
- b.) Identify the basis for stating that there will be “very few such P&DCs.”

APWU/USPS-T1-13 In response to APWU/USPS-T1-6(e) you state that “on a national level, there will be sufficient mail processing capacity and time to process mail to meet scheduled Friday delivery dates.”

- a.) Does this mean that on a “local level” mail processing capacity and time in some places may be limited and therefore, scheduled Friday delivery dates will be unmet?
- b.) You mention that local operating plans will be reviewed and adjusted if necessary to ensure timely delivery.
 - i. Has the review of local operating plans begun?
 - ii. Describe what is involved in this review and provide any related documents.
 - iii. Are certain locations more likely to require adjustments to operating plans? Please identify these locations, generally.
 - iv. Are changes to CETs among the elements of operating plans to be reviewed and adjusted if necessary?

APWU/USPS-T1-14 Please refer to your response to APWU/USPS-T1-8, is the expectation that Express Mail volume will not decline in the next few years true in both a six and five-day delivery environment? Please identify the basis for this expectation.