

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

NOTICE OF FILING REVISED RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS DEAN J. GRANHOLM TO INTERROGATORIES OF THE GREETING CARD  
ASSOCIATION (GCA/USPS-T3- 1, 5) [Errata]  
(July 4, 2010)

The United States Postal Service hereby provides notice that it is filing revised responses of witness Dean J. Granholm to the following interrogatories of the Greeting Card Association:

GCA/USPS-T3- 1, 5

These interrogatories were filed on May 13, 2010, and originally answered on May 27, 2010. For GCA/USPS-T3-1, the data in response to subpart (c)(i) and (ii) have been corrected. For GCA/USPS-T3-5, the reference in subpart (b) to "Finance" has been corrected to say "Labor Relations." The corrected responses are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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

**GCA/USPS-T3-1**

On page 13, lines 2-3 of your testimony, you refer to “other employees who fill in on the sixth day...”.

- a. Please state (i) the categories into which such employees fall and (ii) whether they are full time or part time employees, using the categories in Postal Service witness Colvin’s Attachment 1, page 2.
- b. Please confirm that all employees covered by (a) are city carrier employees. If you do not confirm, please state what craft(s) these employees belong to.
- c. What are the current numbers of all such “other employees” and their numbers of hours in FY 2009, (i) for Monday through Saturday delivery operations and (ii) for Saturday only?

**RESPONSE:**

[a] The City Carrier craft regular work force is comprised of two categories: full-time and part-time. The Postal Service also employs transitional employees in the carrier craft. A breakdown of part-time and transitional employees, who sometimes fill in on the sixth day, follows (it is also possible that full-time employees could fill in using overtime hours):

Part Time:

City Carrier Part Time Regular (PTR)

City Carrier Part Time Flexible (PTF)

Transitional Employee:

City Carrier Transitional Employee (TE)

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[b] Confirmed.

[c] I have received the following information from Finance:

<u>Other employees</u>	<u>current numbers</u>
City Carrier Part Time Regular (PTR) –	833
City Carrier Part Time Flexible (PTF) –	19,850
City Carrier Transitional Employee (TE) –	14,136

<u>Other employees</u>	(i)	(ii)
City Carrier Part Time Regular (PTR) –	1,246,855	88,883
City Carrier Part Time Flexible (PTF) –	39,475,032	6,535,924
City Carrier Transitional Employee (TE) –	27,780,620	4,630,396

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**GCA/USPS-T3-5**

Referring to your testimony, Postal Service witness Bradley states on page 19, lines 11-13, of his testimony that: "Operations experts, however, anticipate the hours savings will be for full time carriers so the appropriate wage for valuing saved hours is the full time regular wage."

a. Where in your testimony do you state that the hours saved from eliminating Saturday delivery will be for full time carriers, as opposed to part time regular or Transitional Employees?

b. What are the wage rate differences, respectively, (i) between full time regular carriers and part time regular, (ii) between full time regular and Transitional Employees, and (iii) between full time regular and the "other employees" you refer to on page 13, line 2 of your testimony?

**RESPONSE:**

[a] Section I, beginning on page 12 of my testimony.

[b] The following responses are based on information from Labor Relations:

(i) There is no difference between Full Time Regular employees and Part Time Regular employee's wages rates at the same step and grade.

(ii) There is a difference of \$ 4.57 per hour between the wage rate of a Step O, CC Grade 2 Full Time Regular employee and a CC Grade 2 Transitional Employee, with the TE being paid less.

(iii) There is a difference of \$ 1.08 between the wage rate of a Step O, CC Grade 2 Full Time Regular employee and a Step O, CC Grade 2 Part Time Flexible employee, with the full time regular being paid less.

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