

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 THE UNITED STATES POSTAL SERVICE REGARDING WITHDRAWAL  
OF RESPONSES OF WITNESS PULCRANO TO PUBLIC REPRESENTATIVE  
INTERROGATORIES (PR/USPS-T3-4 and 5)  
**[ERRATA]**

The United States Postal Service hereby files notice of its withdrawal of two interrogatory responses of witness Pulcrano filed in response to Public Representative interrogatories PR/USPS-T3-4 and 5 on May 21, 2010.<sup>1</sup>

The interrogatories were originally directed to witness Pulcrano in a pleading submitted by the Public Representative on May 7, 2010. That filing was later revised by the Public Representative to make clear that the above-referenced interrogatories were being directed to witness Granholm, whose responses were ultimately filed on May 18, 2010.

Administrative oversight resulted in the Postal Service filing overlapping responses to the same interrogatories prepared by witness Pulcrano on May 21, 2010. Witness Pulcrano has compared the overlapping responses to DFC/USPS-T3-4. Internal miscommunication resulted in a draft response being filed that was not fully vetted and that is not in accord with the judgment of witness Granholm, to whom witness Pulcrano defers on the question of the pace at which full-up 5-day delivery savings can be expected to be achieved.

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<sup>1</sup> The May 21<sup>st</sup> transmittal pleading erroneously identifies the interrogatories as PR/USPS-T1-4 and PR/USPS-T1-5. The May 21st responses identify the interrogatories as PR/USPS-T3-4 and T3-5, respectively.

Witness Pulcrano's response to DFC/USPS-T3-5 redundantly confirms the absence of any estimate of the dollar value of the competitive advantage associated with street delivery on Saturdays. It adds nothing to the record that is not reflected in witness Granholm's response. Accordingly, it also is being withdrawn to avoid confusing the record.

The Postal Service observes that the American Postal Workers Union July 9, 2010 designation of written cross-examination includes the responses of witness Pulcrano to APWU/USPS-T3-4 and T3-5. Postal counsel will work with APWU counsel in the Commission hearing room in advance of today's hearing to clarify the status of those two responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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