

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 POSTAL SERVICE WITNESS BRADLEY  
TO GCA INTERROGATORIES GCA/USPS-T6-14, 16  
(July 14, 2010)

The United States Postal Service hereby provides the response of witness Bradley to the following interrogatories of GCA, filed on June 30, 2010: GCA/USPS-T6-14, 16. Questions 15, 17, and 18 were redirected to the Postal Service. Each interrogatory is stated verbatim and is followed by the response.

UNITED STATES POSTAL SERVICE

By its attorney:

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July 14, 2010

**Response of Postal Service Witness Michael D. Bradley  
To Interrogatories Posed by the GCA**

**GCA/USPS-T6-14**

In light of your answer to GCA/USPS-T6-4. b., please replace the word “volume” with the words “costs or deficits”. On that basis, please answer part a. (as so revised) and part b of GCA/USPS-T6-4.

**GCA/USPS-T6-14 Response:**

My literature review did not turn up any ex post studies of the cost or deficit effect of a reduction in delivery days at other posts but it did produce some material relating to the ex ante estimate of such cost savings, which is the task in this case. I am attaching those materials to this response electronically as a pdf file (GCA.T6.14.Attach.pdf).

**Response of Postal Service Witness Michael D. Bradley  
To Interrogatories Posed by the GCA**

**GCA/USPS-T6-16**

In light of your answers to GCA/USPS-T6-9, please answer the following further questions:

- a. For the route reduction figures you noted in response to part a., what are the percentages of the respective route reductions in relation to the total numbers of routes?
- b. Is the reduction in volume you refer to on page 16 of your testimony based on long run factors such as Internet diversion or short run factors like the current recession?
- c. In light of your answer to a. in the original question, are you retracting or modifying your testimony statement on page 16 that the reduction in mail volume has outstripped the efforts to reduce the number of routes? Please explain your answer fully.
- d. In light of your answer to a. in the original question, are you retracting or modifying your testimony statements on page 16 that “there is available capacity on the street” now and “will be” in the future? Please explain your answer fully.
- e. In light of your answer to a. in the original question, please state whether the Postal Service’s “materially adjusted capacity” renders moot the argument you make in your testimony on page 16, lines 10-16. Please explain your answer fully.

**GCA/USPS-T6-16 Response:**

- a. Here are the requested percentages:

Route Type	Percentage Reduction
City	7.8%
Rural	1.4%
Highway Box	26.4%
Total	6.6%

- b. My work did not require identifying this distinction and I have not done so.

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c. No. There is nothing inconsistent about a material reduction in capacity and a reduction in volume which is greater than the reduction in capacity.

d. No. There is nothing inconsistent about a material reduction in capacity and a reduction in volume which is greater than the reduction in capacity.

e. It does not. There is nothing inconsistent about a material reduction in capacity and a reduction in volume which is greater than the reduction in capacity..

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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