

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 DOUGLAS CARLSON  
(DFC/USPS-T4-22 and 23)

The United States Postal Service hereby provides the responses of witness Frank Neri to interrogatories DFC/USPS-T4-22 and 23. Presiding Officer's Ruling N2010-1/13 ordered the Postal Service to provide these responses by today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 15, 2010

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

**DFC/USPS-T4-22**

Please provide the number of AFCS machines at each facility that cancels and processes outgoing mail.

**RESPONSE**

The table below lists the number of AFCS machines deployed at each mail processing facility as of July 1, 2010. On May 18, 2010, the Postal Service provided the then current number of AFCS machines deployed at mail processing facilities nationwide. The total number of AFCS machines in the table below is lower than the aggregate number reported on May 18th because, in the intervening time, a small number of machines at certain facilities have been deactivated.

<b>Site</b>	<b>AFCS Machine Count</b>
ABILENE TX PO	2
AKRON OH P&DC	5
ALBANY GA GMF	2
ALBANY NY P&DC	4
ALBUQUERQUE NM P&DC	4
ALEXANDRIA LA FACILITY	2
ALTOONA PA P&DF	2
AMARILLO TX P&DF	2
ANCHORAGE AK P&DC	1
ASHEVILLE NC P&DF	2
ATLANTA GA P&DC	6
AUGUSTA GA P&DF	2
AUSTIN TX P&DC	5
BAKERSFIELD CA P&DC	4
BALTIMORE MD P&DC	8
BATON ROUGE LA P&DC	3
BEAUMONT TX P&DF	2
BEND OR P&DF	1
BILLINGS MT P&DC	1
BIRMINGHAM AL P&DC	6
BISMARCK ND	1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

BLOOMINGTON IL P&DF	2
BOISE ID	2
BOSTON MA P&DC	8
BOWLING GREEN KY P&DF	2
BRISTOL VA	1
BROCKTON MA P&DC	4
BROOKLYN NY P&DC	8
BRYAN TX	1
BUFFALO NY P&DC	6
BURLINGTON VT P&DF	2
CAPE GIRARDEAU MO P&D	2
CARDISS COLLINS IL P&DC	9
CAROL STREAM IL P&DC	10
CEDAR RAPIDS IA P&DC	2
CENTRAL MASSACHUSETTS P&DC	5
CHAMPAIGN IL P&DF	2
CHARLESTON SC P&DF	2
CHARLESTON WV P&DC	3
CHARLOTTE NC P&DC	6
CHATTANOOGA TN P&DC	3
CHEYENNE WY P&DC	1
CINCINNATI OH P&DC	7
CLARKSBURG WV P&DF	2
CLEVELAND OH P&DC	7
COLORADO SPRINGS CO P&DC	3
COLUMBIA SC P&DC	3
COLUMBUS GA PO	1
COLUMBUS OH P&DC	8
CORPUS CHRISTI TX P&DC	2
CUMBERLAND MD	1
DALLAS TX P&DC	6
DAYTON OH P&DC	4
DAYTONA BEACH FL P&DF	2
DELAWARE P&DC	3
DENVER CO P&DC	11
DES MOINES IA P&DC	4
DULUTH MN P&DF	1
DVD NJ P&DC	8
EAST TEXAS P&DC	3
EASTERN MAINE P&DF	2
EASTERN SHORE MD P&DF	2
EAU CLAIRE WI P&DF	1
EL PASO TX P&DC	2

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

ERIE PA P&DC	2
EUGENE OR P&DF	2
EUREKA CA	1
EVANSVILLE IN P&DF	2
EVERETT WA P&DF	4
FARGO ND P&DC	2
FAYETTEVILLE AR P&DF	2
FAYETTEVILLE NC P&DC	4
FLORENCE SC P&DF	2
FORT LAUDERDALE FL P&DC	5
FORT MYERS FL P&DC	4
FORT SMITH AR	1
FORT WAYNE IN P&DC	2
FORT WORTH TX P&DC	7
FOX VALLEY IL P&DC	4
FRESNO CA P&DC	3
GAINESVILLE FL P&DF	3
GARY IN P&DC	3
GRAND ISLAND NE P&DF	1
GRAND RAPIDS MI P&DC	5
GREEN BAY WI P&DC	2
GREENSBORO NC P&DC	6
GREENVILLE SC P&DC	4
GRENADA MS CSF	1
GULFPORT MS P&DC	1
HARRISBURG PA P&DC	5
HARTFORD CT P&DC	6
HATTIESBURG MS PO	1
HONOLULU HI P&DC	5
HOUSTON TX P&DC	8
HUNTINGTON WV P&DF	1
HUNTSVILLE AL P&DF	2
INDIANAPOLIS IN P&DC	6
INDUSTRY CA P&DC	5
IRON MOUNTAIN MI P&DF	1
JACKSON MS P&DC	3
JACKSONVILLE FL P&DC	5
JOHNSON CITY TN P&DF	2
JOHNSTOWN PA P&DF	2
KALAMAZOO MI P&DC	3
KANSAS CITY MO P&DC	8
KILMER NJ P&DC	8
KNOXVILLE TN P&DC	4

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

KOKOMO IN P&DF	1
LA CROSSE WI	1
LAFAYETTE IN P&DF	1
LAFAYETTE LA P&DF	3
LANCASTER PA P&DC	4
LANSING MI P&DC	4
LAS VEGAS NV P&DC	5
LEHIGH VALLEY PA P&DF	4
LEXINGTON KY P&DC	3
LIMA OH P&DF	2
LINCOLN NE P&DF	2
LITTLE ROCK AR P&DC	4
LOS ANGELES CA P&DC	10
LOUISVILLE KY P&DC	4
LUBBOCK TX P&DF	2
LYNCHBURG VA P&DF	2
MACON GA P&DC	2
MADISON WI P&DC	4
MANCHESTER NH	4
MANKATO MN P&DF	2
MANSFIELD OH P&DF	2
MCALLEN TX PO	2
MEDFORD OR	1
MEMPHIS TN P&DC	4
MERRIFIELD VA P&DC	7
MIAMI FL P&DC	5
MICHIGAN METROPLEX P&DC	17
MID HUDSON NY P&DC	3
MID ISLAND NY P&DC	8
MID MISSOURI MO P&DF	2
MID-FLORIDA P&DC	3
MIDDLESEX-ESSEX MA P&DC	5
MIDLAND TX P&DF	1
MILWAUKEE WI P&DC	8
MINNEAPOLIS MN P&DC	6
ML SELLERS CA P&DC	7
MOBILE AL P&DC	2
MONTGOMERY AL P&DC	4
MORGAN NY P&DC	13
MUNCIE IN P&DF	1
NASHVILLE TN P&DC	7
NEW ORLEANS LA P&DC	6
NORFOLK NE P&DF	1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

NORFOLK VA P&DC	5
NORTH BAY CA P&DC	3
NORTH HOUSTON TX P&DC	7
NORTH METRO GA P&DC	9
NORTH TEXAS TX P&DC	7
NORTHERN NJ METRO P&DC	7
NY ISC-JFK	1
OAKLAND CA P&DC	8
OKLAHOMA CITY OK P&DC	6
OMAHA NE P&DC	3
ORLANDO FL P&DC	5
OSHKOSH WI P&DF	2
PANAMA CITY FL P&DF	1
PASCO WA P&DF	1
PENSACOLA FL P&DC	2
PEORIA IL P&DF	2
PHILADELPHIA P&DC	10
PHOENIX AZ P&DC	10
PITTSBURGH PA P&DC	8
PLATTSBURGH NY P&DF	1
POCATELLO ID	1
PORTLAND OR P&D	7
PROVIDENCE RI P&DC	5
PROVO UT	2
QUAD CITIES IL P&DF	2
RALEIGH NC P&DC	5
READING PA P&DC	2
REDDING CA PO	1
RENO NV P&DC	3
RICHMOND VA P&DC_1	6
ROANOKE VA P&DC	3
ROCHESTER MN P&DF	2
ROCHESTER NY P&DC	6
ROCKFORD IL P&DC	2
ROCKY MOUNT NC P&DF	2
SACRAMENTO CA P&DC	7
SAGINAW MI P&DC	2
SAINT CLOUD MN	2
SAINT LOUIS MO P&DC	11
SAINT PAUL MN P&DC	5
SALEM OR P&DF	2
SALT LAKE CITY UT P&D	5
SAN ANTONIO TX P&DC	6

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

SAN BERNARDINO CA P&DC	7
SAN FRANCISCO CA P&DC	6
SAN JOSE CA P&DC	6
SAN JUAN PR P&DC	3
SANTA ANA CA P&DC	11
SANTA BARBARA CA P&DC	3
SANTA CLARITA CA P&DC	12
SAVANNAH GA P&DF	3
SCRANTON PA P&DF	3
SEATTLE WA P&DC	7
SHREVEPORT LA P&DC	4
SIOUX CITY IA P&DF	2
SIOUX FALLS SD	2
SOUTH BEND IN P&DF	2
SOUTH JERSEY P&DC	6
SOUTH SUBURBAN IL P&DC	5
SOUTHEASTERN PA P&DC	6
SOUTHERN CT P&DC	5
SOUTHERN MAINE P&DC	4
SOUTHERN MD P&DC	5
SPOKANE WA P&DC	3
SPRINGFIELD IL P&DC	2
SPRINGFIELD MA P&DC	4
SPRINGFIELD MO	4
STAMFORD CT P&DC	3
STOCKTON CA P&DC	4
SUBURBAN MD P&DC	7
SYRACUSE NY P&DC	4
TACOMA WA P&DC	4
TALLAHASSEE FL P&DF	2
TAMPA FL P&DC	11
TERRE HAUTE IN P&DF	1
TOLEDO OH P&DC	3
TOPEKA KS P&DF	2
TRAVERSE CITY MI P&DF	1
TRENTON NJ P&DC	4
TUCSON AZ P&DC	3
TULSA OK P&DC	5
UTICA NY P&DF	2
WACO TX P&DF	2
WATERLOO PLANT IA	2
WAUSAU WI P&DF	2
WEST PALM BEACH FL P&DC	8

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

WESTCHESTER NY P&DC	6
WHEELING WV P&DF	1
WHITE RIVER JUNCTION VT P&DC	2
WICHITA KS P&DC	3
WILLIAMSPORT PA P&DF	1
YOUNGSTOWN OH P&DF	2



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

**DFC/USPS-T4-23**

For each facility that cancels and processes outgoing mail on Saturdays, please provide the percentage of the AFCS cancellation volume at that facility on an average weekday that that facility's AFCS machines cancel on an average Saturday. For example, if the cancellation volume on an average weekday is 1 million pieces, and if the cancellation volume on an average Saturday is 600,000 pieces, the answer to the interrogatory would be 60 percent.

**RESPONSE**

The table below lists the requested information for each facility that cancels and processes outgoing mail on Saturday. The information is based on data from the month of May 2010.

<b>Site</b>	<b>Sat Pct</b>
Abilene TX PO	37.7%
Albany NY P&DC	52.3%
Anchorage AK P&DC	46.7%
Atlanta GA P&DC	38.8%
Augusta GA P&DF	46.3%
Austin TX P&DC	48.2%
Baltimore MD P&DC	52.8%
Baton Rouge LA P&DC	36.8%
Birmingham AL P&DC	55.7%
Bismarck ND	54.2%
Boise ID	50.3%
Boston MA P&DC	96.2%
Cardiss Collins IL P&DC	55.6%
Cedar Rapids IA P&DC	70.2%
Charleston WV P&DC	88.4%
Charlotte NC P&DC	53.7%
Cheyenne WY P&DC	66.8%
Cincinnati OH P&DC	75.8%
Cleveland OH P&DC	116.0%
Colorado Springs CO P&DC	44.9%
Columbia SC P&DC	64.8%
Columbus OH P&DC	47.0%
Corpus Christi TX P&DC	40.3%

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO INTERROGATORY OF DOUGLAS CARLSON**

Cumberland MD	37.7%
Denver CO P&DC	46.9%
Des Moines IA P&DC	52.0%
Duluth MN P&DF	45.7%
East Texas P&DC	52.8%
Eastern Shore MD P&DF	49.3%
El Paso TX P&DC	46.3%
Eugene OR P&DF	60.5%
Eureka CA	40.9%
Fargo ND P&DC	66.7%
Fayetteville NC P&DC	41.9%
Fort Myers FL P&DC	56.6%
Fort Wayne IN P&DC	94.8%
Fort Worth TX P&DC	45.3%
Fresno CA P&DC	44.6%
Grand Island NE P&DF	45.0%
Grand Rapids MI P&DC	82.5%
Greensboro NC P&DC	38.9%
Greenville SC P&DC	41.0%
Gulfport MS P&DC	92.0%
Harrisburg PA P&DC	92.9%
Hartford CT P&DC	147.8%
Honolulu HI P&DC	54.6%
Houston TX P&DC	90.0%
Indianapolis IN P&DC	76.5%
Iron Mountain MI P&DF	43.4%
Jackson MS P&DC	45.9%
Jacksonville FL P&DC	88.2%
Kansas City MO P&DC	53.2%
Kilmer NJ P&DC	79.4%
Knoxville TN P&DC	51.7%
Lafayette LA P&DF	36.3%
Lehigh Valley PA P&DF	78.8%
Lexington KY P&DC	63.1%
Little Rock AR P&DC	49.2%
Los Angeles CA P&DC	40.0%
Louisville KY P&DC	65.2%
Lubbock TX P&DF	86.6%
Macon GA P&DC	93.6%
Manchester NH	48.3%
McAllen TX	47.3%
Memphis TN P&DC	46.3%
Merrifield VA P&DC	53.8%

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
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Miami FL P&DC	97.1%
Michigan Metroplex P&DC	50.9%
Mid Island NY P&DC	50.6%
Midland TX P&DF	36.8%
Milwaukee WI P&DC	96.6%
Minneapolis MN P&DC	63.0%
ML Sellers CA P&DC	99.7%
Mobile AL P&DC	40.5%
Montgomery AL P&DC	38.1%
Morgan NY P&DC	95.0%
Nashville TN P&DC	62.5%
New Orleans LA P&DC	41.3%
North Metro GA P&DC	42.0%
North Texas TX P&DC	66.0%
Oakland CA P&DC	87.5%
Oklahoma City OK P&DC	40.1%
Omaha NE P&DC	80.0%
Palatine IL P&DC	148.8%
Pensacola FL P&DC	68.4%
Peoria IL P&DF	89.1%
Philadelphia PA P&DC	86.8%
Phoenix AZ P&DC	59.4%
Pittsburgh PA P&DC	73.8%
Portland OR P&D	52.9%
Providence RI P&DC	89.3%
Quad Cities IL P&DF	45.8%
Redding CA	43.0%
Reno NV P&DC	43.3%
Richmond VA P&DC_1	59.6%
Roanoke VA P&DC	82.5%
Rochester MN P&DF	78.6%
Rochester NY P&DC	99.8%
Sacramento CA P&DC	91.9%
Saginaw MI P&DC	68.9%
Saint Louis MO P&DC	80.2%
Saint Paul MN P&DC	55.9%
Salt Lake City UT P&D	60.3%
San Antonio TX P&DC	50.5%
San Juan PR P&DC	58.3%
Santa Ana CA P&DC	72.4%
Santa Clarita CA P&DC	75.6%
Savannah GA P&DF	41.8%
Seattle WA P&DC	106.3%

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
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South Jersey P&DC	78.5%
South Suburban IL P&DC	100.3%
Southern Maine P&DC	71.2%
Springfield IL P&DC	92.9%
Springfield MO	50.0%
Suburban MD P&DC	77.8%
Syracuse NY P&DC	54.2%
Tallahassee FL P&DF	40.0%
Tampa FL P&DC	50.4%
Toledo OH P&DC	74.7%
Topeka KS P&DF	42.8%
Traverse City MI P&DF	49.2%
Tulsa OK P&DC	42.1%
Waco TX P&DF	43.5%
Wausau WI P&DF	51.5%
West Palm Beach FL P&DC	55.6%
Westchester NY P&DC	75.0%
White River Junction VT P&DC	71.7%
Wichita KS P&DC	67.6%