

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

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO QUESTIONS FROM THE BENCH AT THE HEARING FOR WITNESS GRANHOLM  
(July 26, 2010)

The United States Postal Service hereby provides its responses to oral questions posed from the bench at the July 14, 2010, hearing on the testimony of witness Granholm. The relevant portions of the transcript are quoted, and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Pricing and Product Support

Brian Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -5492

Docket No. N2010-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION FROM THE BENCH AT THE HEARING FOR WITNESS GRANHOLM  
(JULY 14, 2010)

**QUESTION 1 (Tr. II at 491)**

COMMISSIONER ACTON: In response to one of the Chairman's information requests you had provided some street productivity estimations by day, and we are wondering if you have analyzed historical DOIS data to determine if street delivery function has ever historically achieved the productivities that you've estimated for Mondays following an implementation of Saturday delivery?

THE WITNESS: We never took a look at historical data like that, so I'd be unable to give you a comment on whether or not historically we have seen that type of performance. That's something I could certainly take on as a homework assignment, to look at historical data.

COMMISSIONER ACTON: We would be grateful to have that information, it would give us some gauge of comparative information.

THE WITNESS: Yes.

COMMISSIONER ACTON: Also on productivity, have you ever examined the productivity for an entire five-day week that includes a Monday holiday and compared that to your findings for productivity for the entire six-day week of non-holiday weeks?

THE WITNESS: I don't believe we did look at that, but that's also something we could take a look at.

**RESPONSE:**

The requested productivity data are provided in the attached excel spreadsheet – Response 1.xls.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION FROM THE BENCH AT THE HEARING FOR WITNESS GRANHOLM  
(JULY 14, 2010)

**QUESTION 2 (Tr. II at 496-97)**

COMMISSIONER LANGLEY: Where are the post offices closed on Saturdays located? [e.g., in rural areas?]

THE WITNESS: I believe so yes, the ones that are closed now. I could get you data on those if you like.

COMMISSIONER LANGLEY: It would be interesting to have a breakdown.

CHAIRMAN GOLDWAY: It would be nice to know where they're broken down in what areas.

**RESPONSE:**

The attached excel spreadsheet - Response 2.xls - presents, on a district-by-district basis, the number of post offices that are closed on Saturdays, as well as a nationwide breakdown on how many offices that are closed on Saturday have city delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION FROM THE BENCH AT THE HEARING FOR WITNESS GRANHOLM  
(JULY 14, 2010)

**QUESTION 3 (Tr. II at 510)**

CHAIRMAN GOLDWAY: And so there was some concern that there will be post offices that can't be open or they might be open, but they won't be able to service their post office boxes because there is no rural letter carrier bringing the mail to them.

THE WITNESS: That will not be the case. We have other options: highway contract; we could still use the letter carrier that's --

CHAIRMAN GOLDWAY: And do you have hours figured into the system to cover for those costs?

THE WITNESS: No, we don't. It's such a small occurrence where rural carriers have intermediate drops. It hardly ever happens.

CHAIRMAN GOLDWAY: Do we have a --

THE WITNESS: It's something simply --

CHAIRMAN GOLDWAY: -- number of how many intermediate drops there are? Can you get us --

THE WITNESS: That's a homework assignment that I can get for you.

**RESPONSE:**

While no data base contains the number of intermediate drops where rural carriers bring mail to offices on Saturday, such carriers would have to have a "locked pouch" for that stop. During the most recent rural mail count, there were 965 "locked pouch" mail stops. Thus, there are less than or equal to 965 routes that currently transport mail to other post offices. If 5 Day delivery were implemented, alternate means (such as RCAs or contract routes) would continue to transport this mail on Saturdays.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO QUESTION FROM THE BENCH AT THE HEARING FOR WITNESS GRANHOLM  
(JULY 14, 2010)

**QUESTION 4 (Tr. II at 444-45)**

Q . . . you said that your response rested on charts of salary that were published by the Labor Relations Department.

A That's correct.

Q Are they public documents? Can I infer that from the word "published"?

A You know I'm not sure if they're published or not.

Q Well, we are wondering where we could access those charts, if they are a public document. I don't know whether you know the answer, but if not, perhaps counsel could make an inquiry.

MR. REIMER: I can make an inquiry into that and report back.

MR. STOVER: That would be very helpful if we could have that because we would like --

CHAIRMAN GOLDWAY: To have a report back on whether that data is publicly available?

MR. STOVER: Yes. And if it is publicly available, a copy of the data itself. That would be very helpful. Thank you, Madame Chairman and thank you, Mr. Reimer.

**RESPONSE:**

The attached excel spreadsheet - Response 4.xls - presents the data. These data were published in the November 2009 issue of *The Postal Record*, a publication of the National Association of Letter Carriers, AFL-CIO.