

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 UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES  
APWU/USPS-T1-10-13  
(July 29, 2010)

The United States Postal Service hereby provides the responses of witness Samuel Pulcrano to the above-listed interrogatories of the American Postal Workers Union dated July 6, 2010. The interrogatories are stated verbatim and followed by the responses. A response to APWU/USPS-T1-14 is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
July 29, 2010

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T1-10** In response to APWU/USPS-T1-2 you state that you are in charge of “coordinating the development of detailed implementation plans” but that those plans are “contingent upon developments.”

- a) Have you received any directives or other instructions for what should be included in the implementation plans?
- b) Have you received any guidelines or other instructions for creating the implementation plans?
- c) Provide examples of the developments that would affect the implementation plans.

**RESPONSE**

- (a–b) Yes. I have been directed to ensure that departments responsible for implementing administrative or operational changes associated with the planned service changes develop plans for implementing those changes in a coordinated and timely manner, and that their plans include such information as is necessary to ensure an optimal implementation.
- (c) Legislation by Congress either barring or conditioning the implementation of 5-day delivery, or some constructive suggestion in a Commission advisory opinion might ultimately affect implementation plans.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T1-11** Please refer to your response to APWU/USPS-T1-6(d). Are detached mail units operated by postal employees? If not, please identify who operates these facilities.

**RESPONSE**

Yes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T1-12** In response to APWU/USPS-T1-6(d) you state that analysis is being conducted of “Processing & Distribution Center capacity to determine whether it may be necessary to move processing equipment to some P&DCs and anticipates there will be very few such PD&Cs (sic).”

- a) Describe what is involved in this analysis and provide any documents related to this analysis.
- b) Identify the basis for stating that there will be “very few such P&DCs.”

**RESPONSE**

- a) This capacity analysis consists of modeling potential customer mailing profile variations to existing mail processing equipment capacity. The slides contained in the PowerPoint file titled Modeling\_Scenarios.ppt, which is being filed with these responses, describes the eleven scenarios that are being analyzed. Results will be shared with the Commission upon completion of the analysis, which is anticipated to occur in September 2010.
- b) We anticipate few P&DC's requiring equipment moves. Where modeling suggests the potential for insufficient processing capacity, the capacity analysis is identifying operational window expansion or earlier daily machine scheduling opportunities in lieu of increasing equipment.



UNITED STATES  
POSTAL SERVICE®

# Five-Day Capacity Modeling Scenarios

## 5-Day Capacity Modeling Scenarios

- Scenario 1 – Monday Outgoing
- Scenario 2 – Tuesday Morning DPS
- Scenario 3 – Monday Morning DPS
- Scenario 4 – Friday Outgoing
- Scenario 5 – Saturday Morning DPS
- Scenario 6 – Monday Holiday, Tuesday OG
- Scenario 7 – Monday Holiday, Tuesday DPS
- Scenario 8 – Full Week (in RPG)
- Scenario 9 – Monday Holiday, Wednesday DPS
- Scenario 10 – AFCS 200 Monday Outgoing
- Scenario 11 – Friday Holiday, Weekend DPS

## Scenarios Defined

- **Scenario 1 – Monday Outgoing**
  - Model originating FCM letters/flats on Monday
  - Move all Saturday's originating mail to Monday
  - Examine 2 variants on impact
    - Model cancellations using % by 2000 as an input requirement
    - Model cancellations using cancellation profile from the Tuesday following a Monday holiday (Columbus Day 2009)
- **Scenario 2 – Tuesday morning DPS**
  - Model DPS letter processing Tuesday AM
  - Includes Monday's OG impacts
  - No volume adjustments

## Scenarios Defined

- Scenario 3 – Monday morning DPS
  - Model DPS operations on Sunday evening/Monday morning
  - Assumes first pass of “Saturday’s mail” on Friday night
  - Determine first pass volume required on Saturday night to provide sufficient window for second pass on Sunday night.
  - Use recent volumes and sort programs.

## Scenarios Defined

- Scenario 4 – Friday Outgoing
  - Model originating FCM letters/flats on Friday
  - Determine impacts if some of Saturday volume (letters/flats) is processed on Friday
  - Explore 3 variants on impacts:
    - 25% of Saturday's volume moves to Friday with no change to current cancellation profiles.
    - 25% of Saturday's volume moves to Friday with a % by 2000 input requirement
    - 50% of Saturday's volume moves to Friday with a % by 2000 input requirement

# Scenarios Defined

- Scenario 5 – Saturday morning DPS
  - Model DPS processing on Saturday morning
    - All normal first passes
    - No normal second pass DPS
    - Flow PO Box mail to “Super Box” DPS programs
  - Assumes no movement of mail from Saturday morning
- Scenario 6 – Monday Holiday; Tuesday OG
  - Model originating FCM letters/flats on Tuesday after Monday holiday
  - Assumes no Sunday or Monday processing
  - Move all Saturday’s originating mail to Tuesday
  - Model cancellations using % by 2000 as an input requirement
  - Model using peak volume from a recent Monday holiday

## Scenarios Defined

- Scenario 7 – Monday Holiday; Tuesday morning DPS
  - Model DPS operations on Monday evening/Tuesday morning following a Monday holiday
  - Assumes first pass of “Saturday’s mail” on Friday night
  - Determine first pass volume required over the weekend to provide sufficient window for second pass on Monday night.
  - Use recent sort programs.
  - Use peak holiday week volume from recent Monday holiday week

## Scenarios Defined

- Scenario 8 – Normal Week in 5-Day
  - Model all letter/flat operations for a 5-day delivery week
  - Will use results of other models to plan for weekend processing
  - Will include all operations (MMP, SCF, STD, etc)
  - Will include running RPG to determine output

# Scenarios Defined

- Scenario 9 – Monday holiday, Wednesday morning DPS
  - Model DPS letter processing Wednesday AM following a Monday holiday
  - Includes Tuesday's OG impacts
  - No volume adjustments
- Scenario 10 – Monday Outgoing w/AFCS 200
  - Model originating FCM letters/flats on Monday
  - Move all Saturday's originating mail to Monday
  - Include AFCS 200 deployment
    - Run mail on AFCS 200 prior to legacy machines
    - Model throughput improvements
  - Model cancellations using % by 2000 as an input requirement

## Scenarios Defined

- Scenario 11 – Friday holiday, weekend DPS processing
  - Model DPS operations over the weekend following a Friday holiday
    - Model Friday & Saturday DPS Friday night into Saturday morning
      - All normal first passes
      - No normal second pass DPS
      - Flow PO Box mail to “Super Box” DPS programs
    - Model Sunday night DPS
      - Determine first pass volume required on Saturday night to provide sufficient window for second pass on Sunday night.
  - Use most recent Friday holiday to determine volumes relative to normal week.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T1-13** In response to APWU/USPS-T1-6(e) you state that “on a national level, there will be sufficient mail processing capacity and time to process mail to meet scheduled Friday delivery dates.”

- a) Does this mean that on a “local level” mail processing capacity and time in some places may be limited and therefore, scheduled Friday delivery dates will be unmet?
  
- b) You mention that local operating plans will be reviewed and adjusted if necessary to ensure timely delivery.
  - i. Has the review of local operating plans begun?
  - ii. Describe what is involved in this review and provide any related documents.
  - iii. Are certain locations more likely to require adjustments to operating plans? Please identify these locations, generally.
  - iv. Are changes to CETs among the elements of operating plans to be reviewed and adjusted if necessary?

**RESPONSE**

- a) No. It means that the capacity analysis modeling being performed under the direction of witness Neri at the local level will identify any specific local equipment and operational adjustments that will need to be implemented to ensure the ability of local plants to manage the mail volumes and meet scheduled delivery dates.
  
- b)
  - i. Yes, the capacity analysis is determining where operating plans may need to be adjusted.
  - ii. Based upon identified need during the capacity analysis, local operating plan reviews will be evaluated in more detail to determine appropriate operational level flow changes. As explained in response to APWU-USPS-T1-12, this capacity analysis consists of

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PULCRANO  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

modeling potential customer mailing profile variations to existing mail processing equipment capacity; further detail is available in the PowerPoint file titled Modeling\_Scenarios.ppt, which is being filed with these responses.

- iii. Yes. Potentially there are sites that may need adjustments to their operating plans. These would be sites that can overcome capacity challenges by expanding operational windows or adjusting daily machine scheduling.
- iv. Yes, there is a possibility that operational CETs could be adjusted.