

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

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED BY THE UNITED STATES POSTAL SERVICE TO
NATIONAL ASSOCIATION OF LETTER CARRIERS
WITNESS MICHAEL RILEY
(USPS/NALC-T5-1 THROUGH T5-7)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories and requests for the production of documents to National Association of Letter Carriers witness Michael Riley: (NALC-T-5): USPS/PR-T5-1 through T5-7.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS Interrogatories to NALC witness Riley

USPS/NALC-T5-1.

Please refer to your testimony at page 6, lines 8-10.

- (a) Please explain your understanding of the options for package re-delivery/pick-up that are available to residential customers of FedEx and UPS “who work during the week and who are not home to accept packages”.
- (b) Please explain your understanding of the differences between the options referenced in response to subpart (a) with the options available to residential customers of the Postal Service “who work during the week and who are not home to accept packages”.
- (c) Explain your understanding of whether, in conjunction with the service changes under review in this docket, the Postal Service has indicated on the record in this proceeding that it will monitor local retail traffic and consider making adjustments to retail hours to accommodate residential customer package pick-up in the 5-day delivery environment.

USPS/NALC-T5-2.

Please refer to your testimony at page 6, lines 12-15.

- (a) Is it your view that customers who do not see and speak to their letter carriers on Saturdays are unable to judge the quality of that carrier’s delivery service and the degree to which it reflects positively on the agency’s overall image?
- (b) Do you agree that customers who do not see and speak to their letter carriers on Saturdays, nevertheless, still have the opportunity to obtain a positive image of the Postal Service based upon the quality of service provided by postal clerks at retail windows?

USPS/NALC-T5-3.

Please refer to the first paragraph of Section V of your testimony at page 7.

- (a) Please confirm that your testimony should not be read as implying that, before your tenure as USPS CFO, the Postal Service had never “adopted a business strategy that put an emphasis on the individual customer.”
- (b) Please confirm that your testimony should not be read as implying that, until your tenure as USPS CFO, the Postal Service did not recognize that “things like convenience, courtesy, safety, security of mail and consistency of delivery” were “important to the individual customer.”
- (c) Was the USPS practice of accepting credit card payments the culmination of a project that began before or after the start of your tenure as CFO?

USPS Interrogatories to NALC witness Riley

USPS/NALC-T5-4.

Please fully describe the “promise[]” referenced in the second paragraph of Section V of your testimony at page 7. Provide copies of documents memorializing that promise.

USPS/NALC-T5-5.

Please refer to your testimony at page 6, lines 16-17. Would postal management monitoring of local retail traffic and adjusting retail hours to accommodate residential customer package pick-up in the 5-day postal street delivery environment “send[] a signal to customers that their needs and preferences . . . matter” and that the Postal Service was acting as a “service-oriented enterprise”? If you do not agree, please explain.

USPS/NALC-T5-6.

Please refer to the second paragraph of Section V of your testimony at page 7.

- (a) Identify all factors that may have contributed to mail volume rising “nicely” during your tenure as USPS CFO.
- (b) Is it your view that the “advent of the Internet” during your tenure as CFO had the same qualitative and quantitative effect on mail volumes then as the Internet has had on mail volumes during the past five years? Please explain.
- (c) Is it your view that the “advent of the Internet” during your tenure as CFO had the same qualitative and quantitative effect on mail volumes then as it can be expected to have on mail volumes during the next five years? Please explain.

USPS/NALC-T5-7.

Please refer to Section V of your testimony at page 7 and clarify whether it is your view that, since your tenure, postal management:

- has focused *exclusively* on cost-cutting and paid *no* attention to its relationship with consumers; or
- has focused *too much* on cost-cutting and paid *too little* attention to its relationship with consumers.