

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 DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE TO  
NATIONAL ASSOCIATION OF LETTER CARRIERS  
WITNESS FREDERIC ROLANDO  
(USPS/NALC-T1-1 THROUGH T1-12)

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-1): USPS/PR-T1-1 through  
T1-12.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 11, 2010

## USPS Interrogatories to NALC witness Rolando

### USPS/NALC-T1-1.

Please refer to the first paragraph of page 1 of your testimony.

- (a) Please identify the postal competitors who routinely provide Saturday package delivery to residential customers who shop online. Explain in full the terms and conditions of such delivery service. In each case, compare those terms and services to a corresponding postal product.
- (b) Please confirm that residential postal customers today who are ordinarily not home during the day on weekdays may arrange for weekday re-delivery of an accountable package, either to their address on a weekday when they can be home for delivery or to an alternative address in the same ZIP Code where it can be signed for.

### USPS/NALC-T1-2.

Please refer to the first paragraph of page 1 of your testimony.

- (a) Please confirm that “[m]any local businesses, like Main Street restaurants and retail stores, rely on their local home-town advertising mail to arrive” during in-home windows that can include Saturday.
- (b) Please estimate the percentage of customers of local small businesses today who plan their weekend shopping and outings *only after* the delivery of mail on Saturdays and provide the basis for your estimate.

### NALC/USPS-T1-3.

Please refer to your testimony at page 3, paragraph 2.

- (a) Indicate the years during which you delivered mail to the shopping mall you describe.
- (b) Please describe and provide the results of all analysis you performed before your testimony was filed to determine whether the retail businesses in that mall are the same ones today as during the period specified in response to subpart (a).
- (c) Please describe and provide the results of all analysis that you performed before your testimony was filed to determine whether the promotional mailing practices of the retail stores at that mall today are the same today as during the period specified in response to subpart (a).
- (d) Please describe and provide the results of all analysis that you performed before your testimony was filed to determine whether the promotional mail generated by the retail stores at that mall today is deposited in the mail for delivery only on Saturdays or for delivery during an in-home window that includes both Friday and Saturday.

## **USPS Interrogatories to NALC witness Rolando**

### **NALC/USPS-T1-4.**

Please refer to paragraph 2 on page 4 of your testimony.

- (a) Confirm that retirement homes are populated by residents who, by virtue of being retired, currently have the opportunity meet and greet their letter carrier up to six days a week in the current delivery environment.
- (b) Confirm that retirement homes are populated by residents who, by virtue of being retired, would have the opportunity meet and greet their letter carrier up to five days a week in the 5-day street delivery environment.
- (c) Compared to retirement home residents, would you agree that in both the current and the 5-day delivery environments, there is (or would) not generally be the same frequency of opportunity for other persons who reside “in every street in every village, town and city in America” to experience the same sort of connection between carrier and retirement home customer? If not, please explain.

### **USPS/NALC-T1-5.**

Please refer to the final paragraph on page 4 of your testimony.

- (a) Do you agree that the presence of the Postal Service can be felt and appreciated in communities throughout the nation if the quality of collection, retail, processing and delivery service is excellent, even if residential customers do not see their letter carriers on the street with great frequency?
- (b) All other things equal, which letter carrier’s service is likely to be appreciated more: the letter carrier who provides mediocre service and is frequently seen by residents passing by or the letter carrier who provides excellent service but is rarely seen passing by?

### **USPS/NALC-T1-6.**

Please refer to the final paragraph on page 4 of your testimony. According to the Ponemon Institute study to which you refer, is the Postal Service’s standing as the “most trusted government agency for privacy” attributed solely to the work of letter carriers, clerks, mail handlers, or managers; or is that standing attributed to the collective work of all postal employees? Please explain your response.

### **USPS/NALC-T1-7.**

Please refer to the first full paragraph on page 5 of your testimony and provide copies of records in NALC’s custody reflecting:

- (a) the approximate number of registered Carrier Alert addresses;
- (b) data indicating the frequency by day-of-week with which Carrier Alert reports are submitted to social service agencies.

## USPS Interrogatories to NALC witness Rolando

### USPS/NALC-T1-8.

Please refer to the first full paragraph on page 5 of your testimony.

- (a) Please explain the methods through which NALC is informed of follow-up action taken by Carrier Alert social service agencies.
- (b) Please explain the criteria by which such follow-up action is judged to be life-saving.

### USPS/NALC-T1-9.

- (a) In reference to the five noble San Francisco letter carriers whose actions are described at the bottom of page 5 and top of page 6 of your testimony, would it be fair to say that they “joined forces” with retirement home employees already on the scene and local fire and rescue personnel who also arrived, and that “working together” the combined efforts of all involved resulted in 124 elderly residents being evacuated from the burning retirement home, with only one life lost. If not, please explain.
- (b) Please provide any insight you may have that might explain why the number of rescued residents would be reported as “nearly 100” by *USA Today* as opposed to “nearly 125.” See:  
[http://www.usatoday.com/news/washington/2008-09-10-4210240401\\_x.htm](http://www.usatoday.com/news/washington/2008-09-10-4210240401_x.htm)

### USPS/NALC-T1-10.

Please provide copies of all hard-copy and electronic documents generated by, for, or in association with NALC that have been broadcast or otherwise disseminated for the purpose of appealing to NALC members and retirees, their families, members of another association or affiliated organization, and/or members of the general public to express their views by submitting comments to the Postal Regulatory Commission regarding the service changes under review in this docket. Please indicate the date on which each such appeal was first published, broadcast or disseminated, as well as the dates of subsequent communications directing the attention of readers to previously published appeals.

### USPS/NALC-T1-11.

Please refer to the final paragraph on page 9 of your testimony. Is it the mere presence of postal clerks at postal retail windows and the mere presence of letter carriers on the street or the quality service that clerks and carriers provide that forms the core of the “key connection” between the Postal Service and its customers?

## **USPS Interrogatories to NALC witness Rolando**

### **USPS/NALC-T1-12.**

Please refer to the final two paragraphs on page 6 of your testimony.

- (a) Please summarize the discussions or negotiations between NALC and the Postal Service that led to the agreement that NALC would conduct its annual food drive on a Saturday, as opposed to another day of the week.
- (b) Please confirm that other charitable programs in the United States that successfully depend on household residents to donate household items by leaving them on front porches or outside front doors for pick-up operate local collection activities on days other than Saturdays. If you are unable to confirm, please explain.