

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 PUBLIC REPRESENTATIVE WITNESS EDWARD LUTTRELL
(USPS/PR-T2-28 THROUGH T2-32)

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 Public Representative witness Edward Luttrell: (PR-T-2): USPS/PR-T2-28 through T2-32.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS Interrogatories to PR witness Luttrell

USPS/PR-T2-28.

Please refer to page 3, line 26 of your testimony where you state:

Rural America has the highest proportion of individuals (compared to urban and suburban communities) who are either self employed or who work for someone who is self employed.

Provide data reflecting the relative proportions of rural, suburban and urban Americans who are either self-employed or who work for someone who is self-employed.

USPS/PR-T2-29.

Please refer to page 3, line 29 of your testimony where you state:

In fulfilling orders, in receiving payments, in complying with responses for legal, accounting and other basic services, the Postal Service provides unique and irreplaceable service advantages to micro entrepreneurs operating in rural communities.

Provide data reflecting the relative degrees to which the Postal Service provides unique service advantages to rural, suburban and urban micro entrepreneurs.

USPS/PR-T2-30.

Please refer to page 3, line 23 of your testimony where you state:

Rural Small Businesses Disproportionately Rely on Affordable and Consistent Six Day Postal Services as Part of their Business Plans

Provide data reflecting the relative degrees to which rural, suburban and urban small businesses rely on affordable and consistent six-day postal services.

USPS/PR-T2-31.

Please refer to page 3, line 23 of your testimony where you state:

Grange members believe that it is currently impossible to segregate critical delivery items from the general delivery items among the postal service's deliveries every day.

- (a) Please indicate your understanding of the degree to which the current Mail Classification Schedule offers service and product choices that allow mail senders and recipients to select different dispatch, processing and delivery options for items they deem "critical" and "general."
- (b) Please identify the persons or entities for whom it is impossible to segregate "critical delivery items" and "general delivery items" among those delivered by the Postal Service each day.

USPS Interrogatories to PR witness Luttrell

USPS/PR-T2-32.

Please refer to page 5, line 13 of your testimony where you state:

For customers seeking the delivery of certain medications, again, time sensitivity can be critical to the effectiveness and potency of many human or animal pharmaceutical products.

- (a) By day of week in the current six-day environment, please provide all data that inform your understanding of the percentage of pharmaceutical product mailings that enter the mailstream on each day and that are delivered on each day.
- (b) By day of week in the current six-day delivery environment, please provide all data you have analyzed that reflect the percentage of such deliveries that are time-sensitive.
- (c) Please provide all data relied upon in making the statement quoted above that reflect the percentage of pharmaceutical product mailings that are so time-sensitive that the product's effectiveness and potency would be materially diminished if the mailing were delivered on a Monday instead of the preceding Saturday.