

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY  
(USPS/PR-T2-32)

The Public Representatives hereby provide the responses of witness Edward Luttrell to United States Postal Service interrogatory USPS/PR-T2-32. The interrogatory is reproduced in its entirety and is followed by a response.

Respectfully submitted,

PUBLIC REPRESENTATIVES

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UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-32**

**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 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.

**Response:**

(a-b) I am not aware of the percentage of pharmaceutical product mailings mailed or delivered each day or which are time sensitive. I have read the Las Vegas, Field Hearing testimony of Tom Underkoffler of MEDCO. There, he says that with regard to input of packages into the mail, that the peak activity typically occurs around the Tuesday to Wednesday time frame. (Las Vegas Field Hearing, May 10, 2010, at 42.)

(c) I do not know the percentage of pharmaceutical product mailings whose potency would be affected if the mailing were delivered on Monday instead of the preceding Saturday. I should note that in instances of Federal holidays, delivery would not take place until the following Tuesday. My testimony also states that "Grange members believe the lack of competition from the USPS will reduce the level of competition among the various carriers for time sensitive critical materials." (Testimony, at 5, lines 16-18.)