

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

DOUGLAS F. CARLSON
INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS FRANK NERI (DFC/USPS-T4-1-6)

February 24, 2012

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Frank Neri.

The instructions contained in my interrogatories to witness Whiteman (DFC/USPS-T4-1-9) are incorporated herein by reference.

Respectfully submitted,

Dated: February 24, 2012

DOUGLAS F. CARLSON

DFC/USPS-T4-1. Please explain whether some First-Class Mail, such as First-Class Mail originating in and destined to the service area of a single processing plant, might still be delivered overnight even if the Postal Service changes service standards as it proposes in this docket. In your response, please explain whether the outcome depends on the hours of the day during which the destination ZIP Code is scheduled for DPS processing (e.g., 1 to 2 PM on the day before delivery versus 2 to 3 AM on the day of delivery).

DFC/USPS-T4-2. Please identify the extent to which the Postal Service will offer overnight delivery of First-Class Mail to any presort or large mailers even if it implements the changes proposed in this docket. In your response, please explain how the Postal Service would achieve overnight delivery if the mailer tendered the mail to the Postal Service after DPS sortation was run for the destination ZIP Code.

DFC/USPS-T4-3. Please discuss the general effect on collection times at collection points, including blue collection boxes and post office lobby drops, that you expect the changes in service standards that the Postal Service proposes in this docket to cause. Please provide all relevant documents relating to possible changes in collection times.

DFC/USPS-T4-4. Please identify any planned changes or upgrades to Advanced Facer Cancellor System machines, including improvements in machine processing speed or the legibility of postmarks.

DFC/USPS-T4-5. Please provide the number of AFCS, AFSM 100, FSM 1000, MPBCS, and DBCS machines at each facility.

DFC/USPS-T4-6. For each processing facility that processes outgoing mail on weekdays but not on Saturdays, please indicate the plant to which that processing facility forwards its mail for processing on Saturdays. For purposes of this interrogatory, a “processing facility” is a P&DF, a P&DC, or a post office that postmarks and distributes mail.