

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 GREG WHITEMAN (DFC/USPS-T12-1-9)

February 13, 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 Greg Whiteman.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, electronic-mail messages, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

Dated: February 13, 2012

DOUGLAS F. CARLSON

DFC/USPS-T12-1. Please refer to your testimony at page 3, lines 1–9.

- a. Please identify all time periods during 2010 and 2011 in which the Postal Service or its contractors conducted any market research — whether qualitative, quantitative, or otherwise, and whether already filed in this docket or not — relating wholly or partially to any considered, possible, proposed, or actual changes in service standards.
- b. Please provide all documents not already filed in this docket that relate to market research of any type that the Postal Service or its contractors conducted during 2010 or 2011 that was designed, at least in part, to provide insight into mailer or public reaction to any considered, possible, proposed, or actual change in service standards for First-Class Mail, to estimate volume, revenue, or contribution effects of any considered, possible, proposed, or actual changes in service standards, or otherwise to inform the Postal Service about possible or likely consequences of any considered, possible, proposed, or actual changes in service standards. This interrogatory specifically encompasses, and is not limited to, questions that the Postal Service asked mailers or other members of the public, materials relating to the conduct of focus groups, and results, conclusions, recommendations, and findings of any market research. This interrogatory also encompasses, and is not limited to, market research that only partially relates to changes in service standards.

DFC/USPS-T12-2. Please refer to your testimony at page 4, lines 1–5. Please identify and provide all information available to you, including findings of market research of any type, that do not or may not support your statement that changes to service standards “would have a limited impact” on the “mailing behavior” and “use of the internet as an alternative to mail” of “most consumers and small commercial organizations.”

DFC/USPS-T12-3. Please refer to your testimony at page 4, lines 12–16. Please discuss whether, notwithstanding your findings described in lines 12–16,

customers may actually notice slower First-Class Mail service if the Postal Service implements the changes proposed in this docket. Please provide all documents that support or undermine your conclusion.

DFC/USPS-T12-4. Please discuss, based on findings of all available market research of any type, whether mailers of all types and sizes likely would not support the changes in service standards proposed in this docket if these changes were not necessary for the Postal Service to regain its financial stability.

DFC/USPS-T12-5. Please refer to your testimony at page 7, lines 18–22. Please identify and provide all information available to you, including findings of market research of any type, that do not or may not support your statement that “the impact on volume, revenue and contribution from the changes in the service standards will be a reduction of 2.9 billion pieces or 1.7 percent of total volume, producing a loss in revenue of \$1.3 billion or two percent, and a loss in contribution of \$499 million or two percent, using FY2010 volume, revenue, and contribution data.”

DFC/USPS-T12-6. Please refer to your testimony at page 7, lines 18–22. Please provide all volume, revenue, and contribution estimates that you, other Postal Service employees, or Postal Service contractors made at any time in 2010 or 2011 as a result of the market research that the Postal Service filed in this case, as a result of any market research that the Postal Service or its contractors conducted that was not filed in this case, or based on any other knowledge or information. This interrogatory applies to market research, knowledge, or information that relates wholly or partially to changes in service standards.

DFC/USPS-T12-7. Please refer to your testimony at page 7, lines 18–22. Please provide all volume, revenue, and contribution estimates resulting from the combined effects of changes in service standards and any other service changes or reductions, initiatives, or internal or external factors that you, other Postal Service employees, or Postal Service contractors made at any time in 2010 or

2011 as a result of the market research that the Postal Service filed in this case, as a result of any market research that the Postal Service or its contractors conducted that was not filed in this case, or based on any other knowledge or information.

DFC/USPS-T12-8. Please refer to your testimony at page 9, lines 13–16.

Please provide any results from the market research that would explain whether customers would prefer a significant price increase to the changes in service standards if a significant price increase, along with other steps not including changes in service standards, would ensure long-term financial stability for the Postal Service.

DFC/USPS-T12-9. Please provide all documents not already filed in this docket that relate to market research of any type that the Postal Service or its contractors conducted during 2010 or 2011 that was designed to (1) provide insight into mailer or public reaction to the combined effects of changes in service standards and any other service changes or reductions, initiatives, or internal or external factors, (2) estimate volume or revenue effects of changes in service standards combined with any other service change or reduction, initiative, or internal or external factor, or (3) otherwise inform the Postal Service about possible or likely consequences of the combined effects of changes in service standards and any other service change or reduction, initiative, or internal or external factor. This interrogatory specifically encompasses, and is not limited to, questions that the Postal Service asked mailers or other members of the public, materials relating to the conduct of focus groups, and results, conclusions, recommendations, and findings of any market research.