

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Evolutionary Network Development )  
Service Changes, 2006 )

Docket No. N2006-1

OFFICE OF CONSUMER ADVOCATE  
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE  
(OCA/USPS-1-5)  
March 3, 2006

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

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. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 901 New York Ave., Suite 200, N.W. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-1). Specifically, "the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a

manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, 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, 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 reasonable 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, 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, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, 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, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-1. In the USPS request for an advisory opinion, Docket No. N2006-1, the Postal Service indicates that it is currently unable to provide information on future network redesign service commitment upgrades or downgrades. (Page 3) Please explain what procedures the Postal Service currently plans on following and what information the Postal Service currently plans on providing to the Commission, after the advisory opinion in Docket No. N2006-1 is issued, for each future network redesign proposal? Please include in your response, information that will be provided to the Commission with regard to: (1) the classes and volumes of mail impacted, (2) the regions of the country involved, (3) number and types of consumers affected, (4) the number and specific identification of origin-destination pairs that are expected to change, (5) the impact on USPS costs and savings, and (6) the timing of the information provided to the Commission.

OCA/USPS-2. Please describe the specific notice to be given to local communities potentially impacted by a proposed network redesign. Include in your response:

- a. the specific methods used to inform the communities of a change,
- b. the location of public notices placed in advance of a proposed network change,
- c. the methods used by the Postal Service to gather input from the community about their approval or disapproval of a future network change in relation to the impact it may have upon them.

OCA/USPS-3. With regard to the information gathered in OCA/USPS-2 and pursuant to public notice of a proposed network change, please describe how and at what stage of

the decision-making process, the public's opinion will be integrated into the Postal Service's decision to proceed with the proposed network change.

OCA/USPS-4. The following interrogatory refers to library reference USPS-LR-N2006-1/5, pages 88 - 91.

- a. Please confirm that on page 90, an estimated 2,031 pieces per day (3-digit ZIP Codes 156 and 160) of First-Class mail will experience a downgrade from Overnight delivery to 2-day delivery. If you are unable to confirm, please fully explain.
- b. If your response to part a of this interrogatory is affirmative, please explain the derivation of the 2,031 pieces per day and include in your response a copy of all source documents not previously filed in this docket and the derivation of all calculated values.
- c. Please confirm that on page 91, an estimated 98 pieces per day (3-digit ZIP Codes 156 and 160) of Priority mail will experience a downgrade from Overnight delivery to 2-day delivery. If you are unable to confirm, please fully explain.
- d. If your response to part c of this interrogatory is affirmative, please explain the derivation of the 98 pieces per day and include in your response copies of all source documents not previously filed in this docket and the derivation of all calculated values.

OCA/USPS-5. The following interrogatory refers to library reference USPS-LR-N2006-1/5.

- a. Please confirm that on page 109, there is a reduction of one position, “Diectory Analysis Spec. /16” (sic) for Monmouth P&DC 07799-9998.
- b. If your response to part a of this interrogatory is affirmative, please explain why the proposed annual work hours and the proposed annual cost were not updated to reflect the personnel reduction; and if appropriate, please provide revised documentation to reflect the personnel reduction.