

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

**SIX-DAY TO FIVE-DAY CARRIER DELIVERY
AND RELATED SERVICE CHANGES, 2010**

Docket No. N2010-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS JOSEPH CORBETT
(APWU/USPS-T2-1-6)
(April 23, 2010)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Joseph Corbett (USPS-T-2). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden. For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T2-1 Your background shows you have worked in senior management in two large companies and have extensive experience in consulting. During this time, how often have you advised companies to cut service to become healthier and more viable? Does cutting service generally help a company become healthier?

APWU/USPS-T2-2 How much revenue do you expect the Postal Service to lose if it goes to 5-day delivery. What, in your opinion, will be the primary source of those losses?

APWU/USPS-T2-3 If the Postal Service had not faced the payments into the Retiree Health Benefits Fund as set by the PAEA, would you still consider the Postal Service in "dire financial condition"?

APWU/USPS-T2-4 On page 3 of your testimony, lines 11-12, you state that "in fiscal year 2009, total mail volume fell by an unprecedented 26 billion pieces. ...the largest annual mail volume decline in postal history." How much of this loss can be attributed to the collapse of advertising by the financial services industry in the depths of a catastrophic recession?

APWU/USPS-T2-5 On page 10 of your testimony, lines 8-10, you state "[t]hat loss of volume is permanent. When economic recovery occurs, growing use of the Internet and other digital communications will continue to suppress First-Class Mail volume growth." Please provide all a copy of studies or other documentation and information you relied upon in coming to this conclusion.

- a.) Do you believe that once it rebounds, the financial services industry will continue to abstain from advertising through the mail? Please provide a detailed explanation of your conclusion.
- b.) Please provide all a copy of studies or other documentation and information you relied upon in coming to this conclusion.

APWU/USPS-T2-6 On page 13 of your testimony, lines 10-13, you state "[t]his is what is leading us to consider all options for bringing costs and revenues into line, including reexamination of service features such as 6-day delivery that, if modified, could reap significant cost savings." Please identify all of the options considered by the Postal Service for bringing costs and revenue into line. For all options the Postal Service declined to implement, please provide a detailed explanation for the decision and any related documents.