

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Six-Day to Five-Day Street Delivery  
and Related Service Changes

Docket No. N2010-1

PUBLIC REPRESENTATIVES' INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO UNITED STATES POSTAL SERVICE WITNESS PULCRANO

(April 30, 2010)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission's Rules of Practice, the Public Representatives hereby submit the following set of interrogatories and requests for production of documents to Postal Service witness Pulcrano. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions set out in the Appendix are incorporated by reference.

Respectfully Submitted,  
/s/ Patricia Gallagher

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### **PR/USPS-T1-1**

Exhibit 3 in USPS-LR-N2010-1/1 at 22 shows a volume change of -4.43% for Express Mail, assuming 5-day delivery had been implemented in FY 2009. Assuming for the purpose of this interrogatory that the Postal Service's proposal to change delivery frequency is adopted in FY 2011 and Express Mail is the only product which will be delivered on Saturday, has the Postal Service projected the impact on Express Mail volume or have any expectation about the impact under either a full- or partial-implementation scenario? In particular, does the Postal Service expect Express Mail volume to continue to decline (and to have the greatest decline in terms of volume percentage) under a 5-day scenario?

### **PR/USPS-T1-2**

Assuming for the purpose of this interrogatory that the Postal Service's proposal to change delivery frequency is adopted and Express Mail is the only product which will be delivered on Saturday, does the Postal Service anticipate making any changes to Express Mail rates, terms or conditions, other than the postage refund terms and conditions proposed at 74 FR 22725 (April 30, 2010)?

### **PR/USPS-T1-3**

Has the Postal Service considered introducing any new mailing products specifically because it is interested in adopting a 5-day street delivery model?

### **PR/USPS-T3-4**

In USPS-LR-N2010-1/1 at 19, it is stated that full-up savings refers to "the annual savings and associated volume reductions after the transition period needed to reduce staffing and adapt contracts, plants and equipment to eliminate Saturday delivery." Can you provide an estimate, in terms of months, for how long the Postal Service expects the entire transition period to last?

### **PR/USPS-T3-5**

At USPS-T-1 at 3, you state: "... Saturday delivery may be viewed as a competitive advantage that the Postal Service should be loath to relinquish." Has the Postal Service estimated the dollar value of the competitive advantage associated with street delivery on Saturday?

**PR/USPS-T3-6**

In USPS-LR-N2010-1/1 at 4, it is stated that “ ... a significant portion of the current workforce — 44 percent —is eligible to retire between now and 2014.” Please provide the retirement attrition rate for several recent fiscal years by Craft and for management (and by any other readily-available breakdown) or identify where this information can be found in publicly-available documents.

**PR/USPS-T3-7**

Under the Postal Service’s 5-day delivery plan as presently configured, is it correct that there will be disparate impact on Commercial Mail Receiving Agents (CMRAs), depending on whether the CRMA business plan uses a street address or a Postal Service-provided post office box?

## DEFINITIONS AND INSTRUCTIONS

1. Each of the following discovery requests is continuing in nature. The Public Representatives requests that if you obtain any additional responsive information or documents at any later date, you promptly inform one of the Public Representatives and submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any requested data, information, or documents requested, the party to whom the discovery request is directed should provide a privilege log (see, e.g., Docket No. C99-1, P.O. Ruling C99-1/9 at 4). 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).
3. If in response to any discovery request the Postal Service is unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.
4. If a response to any questions contained in the attached discovery requests require any calculations, analysis, assumptions, or studies that have been prepared, please provide and identify copies of such calculations, analysis, assumptions, studies, and all related workpapers.
5. If an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.
6. If data or information is not available in the exact format or level of detail requested, please provide such data or information (a) in a substantially similar format or level of detail or (b) in a format susceptible to being converted to the requested format and level of detail.
7. The term “Postal Service” includes all agents, employees, officers, directors, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors, subcontractors to the Postal Service, and the Postal Service Office of Inspector General.
8. The terms “document” or “documents” are synonymous in meaning and equal in scope to the usage of the terms as defined by 16 CFR 3.34(b), including but not limited to the original or a copy of any letter, email, note, spreadsheet, memorandum, directive, report, study, meeting minutes, contract, diary entry or schedule, presentation, print out, speech, testimony, pamphlet, chart, tabulation, workpaper, draft, recording, and other

writing or retrievable data or whatever kind or nature to which the Postal Service has or has had access to, regardless of origin or location, hardcopy or electronic, handwritten or typed. Documents should be produced in the way they are maintained.

9. The term “describe” means to detail in full, with specificity, the event or situation at issue.

10. The term “identify,” (a) when used with regard to a person, means to provide the full name and position of the person, and (b) when used with regard to a document means to describe the subject matter of the document, its author, the date, and any intended recipients.

11. The term “communication(s)” means the transmittal of information by any means and includes communications or any kind, whether written, oral, electronic, or other.

12. All “documents,” as defined above, responsive to discovery requests 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, should be produced.

13. Responses to requests for explanations or derivation of numbers should be accompanied by workpapers.

14. The term “workpapers” includes all backup material whether prepared manually, mechanically or electronically. Workpapers should, if necessary, be prepared as part of the witness’s responses and should allow a third party to understand how the witness took data from a primary source and developed that data to achieve a final result. If Excel-type spreadsheets are used, please provide a version of the worksheets that include the underlying formulas for each cell.

15. Unless otherwise noted, all postal related terms have the definitions of the current version of the Postal Service’s Publication 32 – Glossary of Postal Terms.