

**BEFORE THE
POSTAL REGULATORY COMMISSION**

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

Docket No. N2010-1

**FIRST SET OF INTERROGATORIES AND DOCUMENT REQUESTS OF
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO**

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission's Rules of Practice, the National Association of Letter Carriers, AFL-CIO ("NALC") hereby submits the following interrogatories and document requests to the United States Postal Service ("USPS"). If necessary, please redirect any interrogatory to a more appropriate USPS witness.

Respectfully Submitted,

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Instructions and Definitions:

1. Each of the following discovery requests is continuing in nature. NALC requests that if you obtain any additional responsive information or documents at any later date, you promptly submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any requested data, information, or documents requested, please describe the privilege and the data, information or documents to which you contend it applies.

3. If in response to any discovery request you are 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 an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.

5. The term “USPS” includes all agents, employees, officers, directors, attorneys and representatives of USPS, and anyone acting on its behalf, as well as the Board of Governors and the USPS Office of Inspector General.

6. The terms “document” or “documents” include but are 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 of whatever kind or nature to which USPS has access, regardless of origin or location, and whether in hardcopy or electronic form, handwritten or typed.

7. If an objection is made to a request on the ground that to provide the requested discovery would constitute an undue burden, provide all requested information that can be supplied without undertaking what is claimed an undue burden.

Interrogatories

Interrogatories to Dean J. Granholm (USPS-T-3):

1. Provide the same categories of data listed on Table 2 on page 4 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) broken out separately as between FY2008 and FY2009.

2. Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Wednesday and each Wednesday following a Monday holiday in FY 2008 and FY 2009.
3. Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Thursday and each Thursday following a Monday holiday in FY 2008 and FY 2009.
4. Provide the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for each normal Friday and each Friday following a Monday holiday in FY 2008 and FY 2009.
5. Provide the overtime hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2008.
6. Provide the overtime hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2009.
7. Provide auxiliary assistance hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2008.
8. Provide auxiliary assistance hours for city letter carriers on normal Tuesdays and Tuesdays after a Monday holiday for FY 2009.
9. Provide the “average volume” (as that term is used on Table 2 of USPS-LR-N2010-1/3) for each day of the week (i.e., Mondays, Tuesdays, etc.), provided separately for FY 2008, FY 2009 and, to the extent available, FY 2010.
10. Provide, separately for FY 2008, FY 2009 and FY 2010, the same categories of data listed on Table 2 of USPS-LR-N2010-1/3 (i.e., average volume, average office hours and average street hours) for the Tuesday following Martin Luther Kings’s Day and the Tuesday following Presidents Day.
11. Provide auxiliary assistance hours provided to letter carriers, broken out separately for each quarter in FY 2008, FY 2009 and FY 2010.
12. On page 11, line 16 of your testimony, you state that “During 2009, City carriers’ daily average per route was less than eight work hours.” Provide, separately for FY 2006, FY 2007, FY 2008, FY 2009 and, to the extent available, for FY 2010, city carriers’ daily average work hours per route.
13. USPS-LR-N2010-1/3 states at page 2 that “City routes averaged 7.55 hours on Saturdays during August and September of 2009.” Provide average hours for city routes for all days of the week combined for each quarter of FY 2008, FY 2009 and FY 2010, stated separately for each quarter.
14. Provide the total number of city delivery routes for each quarter in FY 2008, FY 2009 and FY 2010 (to the extent FY 2010 data is available), stated separately for each quarter.

15. Provide the total number of delivery points on all city delivery routes combined for each quarter in FY 2008, FY 2009 and FY 2010 (to the extent FY 2010 data is available), stated separately for each quarter.

16. You state at page 5, line 17 of your testimony that “delivery supervisors will likely defer non-committed mail for delivery on Tuesday.” Do you have an estimate of how much mail will be deferred to Tuesday? If so, provide the estimate. Do you have an estimate of how much non-committed mail will be deferred to days other than Tuesdays? If so, provide the estimate.

17. You state at page 5 of your testimony that increased mail volume on Fridays, Mondays and Tuesdays are possibly expected to lead to increased work hours in the form of overtime and/or auxiliary assistance. Do you have an estimate of how much such overtime and/or auxiliary assistance hours may increase and how much that might cost USPS? If so, provide the estimate.

18. State how many new city delivery routes you believe USPS would have to create as a result of its elimination of Saturday delivery. Provide the data and analysis for your response.

Interrogatory to Jeff Colvin (USPS-T-7):

1. Table 6 on page 18 of your testimony refers to a projected savings of \$2.263 billion from city letter carriers. Does this projection take into account the possible increase in overtime and/or auxiliary assistance referred to on page 5 of Dean Granholm’s testimony? If so, provide the cost estimate that is used and the data and analysis on which the estimate is based.

2. Does the projected savings of \$2.263 billion from city letter carriers on Table 6 of your testimony assume that there will be no increase in the number of city routes as a result of the elimination of Saturday delivery? If you assume there will be an increase, provide the estimated increase and the data and analysis on which the estimate is based.

Interrogatories to Joseph Corbett (USPS-T-2):

1. You state at page 4 of your testimony that:

The critical fiscal condition of the Postal Service in 2010 can largely be attributed to these factors: the diversion of letter mail to electronic alternatives; the ongoing effects of the economic recession; the statutory obligation to pre-fund retiree health benefits at an accelerated pace; and the restrictions on making adjustments to our operations network and cost structure.

To what extent is the fiscal condition of USPS in 2010 attributable to each of the foregoing factors, stated separately. Provide data supporting your response.

2. Your testimony, at page 13, discusses USPS’s financial projections over the next decade. Provide USPS’s projections for its operating revenue, operating expenses and total mail

volume from 2010 to 2020 (with the projections broken out separately for each year, if you have such yearly projections), and the reasons and data on which such projections are based.

3. Provide the most recent available data for FY 2010 year-to-date of USPS's operating revenue, operating expenses and total mail volume.

4. You state at page 4 of your testimony that USPS through February was about \$1 billion "ahead of plan." How far ahead or behind plan is USPS according to the most recent data available?

5. Provide any reasons, and any data, that support your projections for total mail volume for each year from FY 2010 to 2020.

6. You state at pages 8-9 of your testimony that "[w]e believe that the recession itself may have accelerated the diversion of First-Class Mail to the Internet." Explain the reasons, and provide any data, on which you base this belief.

7. Your testimony, at page 12, provides figures on the "direct costs of carriers" as a percentage of "total USPS costs." Provide, separately for each year, the direct costs of carriers from FY 2000 through FY 2009. Provide, separately for each year, total USPS costs from FY 2000 through FY 2009.

8. To what extent is USPS's projection, set forth in a press release on March 2, 2010, of a "cumulative shortfall of \$238 billion by 2020" based on an assumption that retiree health benefit prefunding requirements will continue? What is the total dollar amount of your assumption of the cost of the prefunding requirement?

9. Postmaster General Jack Potter testified on March 18, 2010 before the Senate Appropriations Subcommittee on Financial Services and General Government that if USPS is found to have overpaid \$75 billion into the Civil Service Retirement System, USPS would not have to cut the frequency of service: "... if that were to happen, we wouldn't have to go to ... five day delivery." Do you agree that the elimination of Saturday delivery would be unnecessary if USPS were credited with the \$75 billion?

10. Your testimony, at page 11, discusses "inflation-adjusted revenue per delivery point" from 2000 through 2009. Provide, separately for each year, the inflation-adjusted revenue per delivery point from 2000 through 2009 and the inflation-adjusted cost per delivery point from 2000 through 2009.

Interrogatories to Samuel Pulcrano (USPS-T-1):

1. You state at page 13, line 2 of your testimony that USPS "still transports trillions of dollars worth of remittances through the mail annually." Provide your estimate of the amount of dollars worth of remittances that are sent by mail annually and any projections you have regarding how that amount may change over the next ten years. Provide any data upon which your projection is based.

2. Did the Post Office Department or USPS ever before in its history propose the elimination of 6-day delivery? If so, please provide a description of the proposal; indicate when and to whom it was made; and what happened to the proposal (i.e., how and/or why it was not adopted.).

3. Did the Post Office Department or USPS ever before 2009 predict a long-term decline in mail volumes? When and what were the predictions?

Interrogatories to Gregory Whiteman (USPS-T-9):

1. On page 2 of your testimony, you estimate a loss of 1.238 billion pieces of mail from the elimination of Saturday delivery. Is that estimate based entirely on the research of Opinion Research Corporation described in USPS-T-8?

2. Has USPS ever on any occasions prior to 2009 conducted, or sponsored the conduct of, the type of qualitative and quantitative research described in your testimony and the testimony of Rebecca Elmore-Yalch (USPS-T-8) concerning the elimination of Saturday delivery? If so, state who conducted the research, when it was conducted and provide the results.

Document Requests:

1. Provide copies of any documents, including but not limited to reports, analyses, memoranda or studies, which were relied upon in the preparation of USPS's answers to the foregoing interrogatories or which are referenced in USPS's answers to the foregoing interrogatories.

2. Provide, for each prior occasion in which the Post Office Department or USPS proposed eliminating 6-day delivery, any and all analyses, reports, forecasts or financial projections on which USPS based its proposal.

3. Provide any analyses, reports, forecasts or projections produced or sponsored by the Post Office Department or USPS before 2009 of a long-term decline in mail volume.

4. Provide any reports or analyses or studies conducted or sponsored by the Post Office Department or USPS prior to 2009 concerning the anticipated effects of the elimination of Saturday delivery, including but not limited to the impact on customer demand and on mail volume.

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