

**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 OF NATIONAL ASSOCIATION OF LETTER
CARRIERS, AFL-CIO TO USPS WITNESS DEAN J. GRANHOLM (USPS-T-3)**

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 to USPS witness Dean J. Granholm (USPS-T-3). 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

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.