

**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 JEFF COLVIN (USPS-T-7)**

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 USPS witness Jeff Colvin (USPS-T-7). 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. 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.