

**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 JOSEPH CORBETT (USPS-T-2)**

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 Joseph Corbett (USPS-T-2). If necessary, please redirect any interrogatory to a more appropriate USPS witness.

Respectfully Submitted,

/s/ Peter D. DeChiara
Peter D. DeChiara
Cohen, Weiss and Simon LLP
330 West 42nd Street
New York, New York 10036-6976
(212) 356-0216
pdechiara@cwsny.com
Attorneys for NALC

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. 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.