

**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 TO USPS WITNESS
SAMUEL PULCRANO (USPS-T-1)**

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 Samuel Pulcrano (USPS-T-1). If necessary, please redirect any interrogatory or document request 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. 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?

Document Requests:

4. 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.

5. 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.