

**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 REQUEST OF  
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO TO USPS WITNESS  
GREGORY M. WHITEMAN (USPS-T-9)**

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 request to USPS witness Gregory M. Whiteman (USPS-T-9). If necessary, please redirect any interrogatory or the 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. 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 Request:

3. 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.