

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001**

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**SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010**

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**Docket No. N2010-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS JEFF COLVIN  
(APWU/USPS-T-7-1-3)  
(May 28, 2010)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Jeff Colvin (USPS-T-7). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden. For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T7-1 On page 2 of your testimony you state that the “full-up savings’ refers to the annual savings less associated volume reductions available after the completion of all adjustments needed to reduce staffing and adapt contracts, plants, and equipment to the changed operational environment.”

- a). While FY2009 has been used to estimate the savings, the actual change to 5-day delivery could not be made earlier than FY2011. Are you making the assumption that all the adjustments that would be made would be based on FY2009 volumes and number of delivery points?
- b). Is it correct to assume that your estimates do not incorporate any growth in the number of delivery points or volume between FY2009 and FY2011/FY2012?
- c). What adjustments to your assumptions would be necessary to determine estimated savings for the FY2011 or FY2012 period?
- d). As the Postal Service plans toward a network sized for 5-day delivery, what size network is it using as its post-completion benchmark? The one as it was in FY2009 minus the additional volume losses from going to 5-day delivery?
- e). If this is not the size network that is being used for planning purposes, please supply the parameters that are actually being used and explain how the Postal Service intends to estimate the actual changes that will be required in staffing, contracts, plants and equipment.

APWU/USPS-T7-2 The *Comprehensive Report of Postal Operations 2009* states on page 31 “[w]hen fully implemented, Phase 1 of FSS [flats sequencing system] will deploy 100 systems to 42 sites; the goal is to complete this phase in 2011.” That compares to 1 FSS functional for the full year 2009 and seven others that were put into service before yearend.

- a). The ROI for the FSS is primarily based on a reduction in carrier workhours and facility space savings. Do the savings from 5-day delivery calculated from a FY2009 base include some of the reductions in carrier workhours that are associated with calculating the ROI for the FSS? If not, why not?
- b). Wouldn't it be more accurate to calculate 5-day delivery savings from a baseline that already incorporates all the savings from implementing Phase 1 of the FSS since it is scheduled to be completed in 2011?
- c). Did you run any alternative scenarios to estimate the sensitivity of your estimates to changes such as these?
- d). What other significant operational changes are scheduled to take place between now and 2011/2012 that could impact your estimates?

APWU/USPS-T7-3 On page 15 [12-15] of your testimony you indicate that savings from longer runs are obtainable for each sort plan run. If actual volume is different than the 2009 estimates would that impact any of your productivity estimates?