

**BEFORE THE  
POSTAL REGULATORY COMMISSION**

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

Docket No. N2010-1

**SECOND SET OF DISCOVERY REQUESTS 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 additional discovery requests to USPS witness Joseph Corbett (USPS-T-2). These requests are part of discovery for purposes of developing NALC's direct case. If necessary, please redirect any interrogatory or document request to a more appropriate USPS witness.

Respectfully Submitted,

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**Instructions and Definitions:**

The instructions and definitions for these interrogatories/document requests are the same as for NALC's First Set of Interrogatories to you.

**Interrogatories/Document Requests**

11. Provide Revenue, Total Expenses and Net Income by year from 1972 to the second quarter of 2010.

12. Provide Revenue from Mail and other Postal Services, Appropriation Revenue, and total Revenue by year from 1972 to the second quarter of 2010.
13. Provide the amount of Unfunded Retirement Liabilities from 1972 to the second quarter of 2010.
14. Provide the percentage of Postal Operating Revenue to GNP/GDP by year from 1972 to 2009.
15. Provide Mail Volume by category from 1972 to the second quarter of 2010. Categories should include but not be limited to First Class, Priority, Express, Periodicals, International, Parcel Post or Fourth Class, Standard or Third Class, Certified, Registered, and other.
16. Provide the number of pieces of mail per work year from 1972 to the second quarter of 2010.
17. Provide the amount of revenue and contribution to institutional costs for all Postal products and services from 1972 to 2010. Separate those products and services between those whose prices are subject to constraint and those in which the Postal Service has pricing flexibility. If any year is unavailable, provide data for available years.
18. Provide revenue and number of transactions for all postal electronic initiatives including Postal branded electronic bill presentment and payment, electronic money orders, electronic registered mail and electronic certified mail
19. Provide estimates of savings made prior to the implementation of major automation initiatives and the actual savings achieved for all capital expenditures in excess of \$500 million.
20. Provide the number of delivery points by type of delivery point by year from 1972 to the second quarter of 2010. If possible break the information into categories of door delivery, rural mail boxes, centralized delivery to CBUs, centralized delivery to Apartments, Post Office Boxes and customer pick up of bulk delivery.
21. Provide the number of vehicles owned by the Postal Service by year by type including a break down by fuel and hybrid status for all years available between 1972 and 2010.
22. Provide a breakdown of market share of Standard Mail / Advertising between Direct Mail; Internet Advertising; Radio, Television, & Cable, Newspapers & Magazines, and Other for all years available between 1972 and 2002.
23. Provide the revenue market share of Package Services by service provider for all years available between 1972 and 2010. Please break the information down into Air and ground categories.

24. Provide a comparison of the revenue and contribution to institutional costs of each of the 10 largest mailers with Negotiated Service Agreements (NSA) for the two years prior to the implementation of the agreement and the years after the agreement was implemented.
25. Provide the annual volume, revenue, and contribution to institutional costs for the Premium Forwarding Service by year since implementation. Provide information about the amount of advertising and type of advertising used to promote this Service.
26. Provide estimates of the change in revenue and contribution to institutional costs for the "Summer Sale."
27. Provide estimates of costs, increased revenue, and contribution to institutional costs for the "If it fits, it ships" advertising.
28. Provide data comparing the Postal Service's budgeted net income, forecasted net income and actual net income by year from 1972 to the second quarter of 2010.
29. Provide the volume of mail that is physically pre-sorted by private sector companies. Provide two categories: mail from one mailer and mail from companies that collect mail from multiple mailers. Provide data for years available from 1972 to 2010.
30. Provide any Postal Service studies or information about changes to revenue and contribution to institution costs resulting from pricing flexibility on competitive products by year from 2006 to 2010. Provide the changes made to the prices of competitive products and the date of these changes.
31. Provide a list of all new products and services introduced after 2000. Provide the revenue and contribution to institutional costs by year of these services.
32. Provide any studies paid for or made by the Postal Service regarding electronic diversion of mail between 1990 and 2010.
33. Provide any studies of the reasons for customers to switch to electronic communication and bill paying from use of the mail made between 1990 and 2010.
34. Provide cost estimates to customers comparing the use of the mail with electronic communication, bill paying, and bill presentment.
35. Provide the basis, including any calculations and assumptions, for your estimate of \$110 million in implementation costs in 2011, as set forth on page 16 of your testimony.