

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

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

Docket No. N2010-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS THOMAS G. DAY
(APWU/USPS-T10-1-4)
(June 9, 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 Thomas G. Day (USPS-T-10). 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-T10-1 On page 4 of your testimony you describe service provided to a mail piece as being the difference between the “start-the-clock” and “stop-the-clock” dates, excluding non-delivery days.

- a). For each type of mail, please estimate what percentage will have its absolute time in the system extended one day because there is now one extra non-delivery day per week.
- b). According to your testimony, this extra time in the system will not impact the Postal Services’ definitions of service performance. Has the Postal Service collected focus group or other marketing information on whether users of the Postal Service consider this to be a service degradation?

APWU/USPS-T10-2 You state there will be no changes to Express Mail collections and delivery and that an additional fee will apply only to Sundays and Federal holidays. Has the Postal Service decided for certain that it will not extend that fee to Saturday deliveries of Express Mail? If no decision has been made, what factors will be considered in making this determination?

APWU/USPS-T10-3 On page 8 [10-12] you state that mail deposited at the BMEU *may* qualify for start-the-clock on the day of acceptance if it arrives when the BMEU is open and the mail is containerized for the local area of the plant. What factors will determine that mail will qualify for start-the-clock status on the day of acceptance?

APWU/USPS-T10-4 Starting on page 8 you discuss several entry methods for Full Service Intelligent Mail barcode mail pieces.

- a). Will any of the IMb pieces qualify for “start-the-clock” status on a Saturday? If so, under what circumstances?
- b). Will any of the IMb pieces qualify for “start-the-clock” status on Fridays after 2pm? If so, under what circumstances?
- c). What percentage of bulk barcoded mail is currently entered on Friday afternoons and Saturdays?