

**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 FRANK NERI
(APWU/USPS-T4-1-8)
(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 Frank Neri (USPS-T-4). 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-T4-1 On page 13, lines 17-18 of your testimony you state that “currently, most processing facilities have the greatest available capacity on Monday night for Tuesday delivery.” Which day of the week do most processing facilities have the least excess capacity?

APWU/USPS-T4-2 On page 14, lines 5-7 of your testimony you state that the Postal Service currently has adequate capacity to be able to dispatch increased mail volume to delivery units in time for delivery on Friday. Is there also have enough capacity to cover the increased demand for slots for Thursday drops to the processing facilities by mailers? If the demand for such slots exceeds the supply, how will it be determined which mailer gets a slot?

APWU/USPS-T4-3 You indicate on page 9, line 1-3 of your testimony that support of the delivery of PO box mail on Saturdays will require modifications to the distribution software and method changes. Are those changes underway? If not, when would you plan to begin making and testing software changes?

APWU/USPS-T4-4 Will the changes in mail processing procedures require increased storage space? If so, will that increase mostly be at the plant, the delivery unit or in transportation trailers?

APWU/USPS T4-5 What is the Postal Service’s current best practice if mail volume exceeds the ability to process it on a given day? Please describe which mail, if any, is held for processing the next day. Please describe which mail, if any, might be sent to the delivery unit for sorting.

APWU/USPS T4-6 On page 17 of your testimony you indicate that additional workhours will be needed to isolate PO box mail at the processing plants for Saturday delivery. Will those additional hours be needed on Fridays?

APWU/USPS T4-7 On page 12 of your testimony you indicate that you are modeling operations at each processing facility location to determine any changes that may be necessary to facilitate five-day delivery.

- a). When will that modeling be completed?
- b). Will the Postal Service provide a summary of its findings to the Postal Regulatory Commission?

- c). Are anticipated 5-day delivery workload changes being factored in to any AMP studies underway? Have or will anticipated 5-day delivery workload changes be evaluated in approved, but not yet implemented AMP consolidations? If not, why not?

APWU/USPS-T4-8 What, if any changes will be made to critical entry times or clearance times as a result of the changes in mail processing operations?