

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

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

Docket No. N2010-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
NNA INTERROGATORY NNA/USPS-T2-10.d TO WITNESS CORBETT
(June 14, 2010)

The United States Postal Service hereby objects to the following interrogatory of NNA, filed on June 3, 2010: NNA/USPS-T2-10.d. Question 10, in its entirety, reads as follows:

NNA/USPS T2-10

With respect to the Postal Service's agreement with the National Association of Rural Letter Carriers Association (NARLC):

- a. Do you agree that the Postal Service's contains provisions to adjust compensation as mail volume grows or shrinks?
- b. Does any other employee group contract contain similar provisions?
- c. To your knowledge, has this provision cause the Postal Service to have difficulty filling rural letter carrier positions?
- d. To your knowledge, has the Postal Service proposed to any employee group within the past five years that contracts should include volume-adjusting provisions similar to that in the NARLC contract?

The Postal Service objects to part d. of this question on the grounds of privilege. This part of the question asks the Postal Service to disclose the substance of proposals and discussions that were part of the collective bargaining process. When finalized, the collective bargaining contracts are public documents. Thus, the Postal Service does not object to parts a. or b. of question 10. The negotiations that precede those agreements, however, are not public. Those negotiations are akin to a settlement process, and the contents of settlement discussions are well-recognized as privileged. Therefore, the

Postal Service objects to a question which requests disclosure of information regarding proposals that may or may not have been made during the collective bargaining process, rather than the substance of the collective bargaining agreements that ultimately emerged. On that basis, the Postal Service objects to NNA/USPS-T2-10.d.

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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