

**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 GREGORY M. WHITEMAN  
(USPS-T-9)**

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 Gregory Whiteman (USPS-T-9). 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 discovery requests to you.

**Interrogatories/Document Requests**

4. Please indicate the marketing or other survey research undertaken to inform customers (particularly large mailers) of the total impact on them of receipt, acceptance, etc. associated with the 5-day proposal and the changes in delivery arrangements resulting from the proposal.

5. What research was undertaken to determine the level of understanding of mailers concerning the impact on service quality, acceptance conditions, and timing of delivery under the 5 day proposal.