

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

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

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Docket No. N2010-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE WITNESS KATE BROWN  
(USPS/PR-T1-1 THROUGH T1-10)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories and requests for the production of documents to Public Representative witness Kate Brown: (PR-T-1): USPS/PR-T1-1 through T1-10.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

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Michael T. Tidwell  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
[michael.t.tidwell@usps.gov](mailto:michael.t.tidwell@usps.gov)

August 10, 2010

## **USPS Interrogatories to PR witness Brown**

### **USPS/PR-T1-1.**

Please refer to page 1, lines 26-29 of your testimony

- (a) Identify the statutory restrictions on future decisions about nationwide delivery changes that you are concerned about the Postal Service seeking to have eliminated.
- (b) Provide citations to Postal Service expressions of intent to pursue elimination of these provisions.

### **USPS/PR-T1-2.**

Please indicate whether, to your knowledge, “above and beyond the all of duty” postal operations or the type described from page 5, line 29 to page 6, line 2 of your testimony are a statewide phenomenon in Oregon or are isolated to the service area of the Portland Processing and Distribution Center.

### **USPS/PR-T1-3.**

In reference to page 6, lines 30-31 of your testimony, please provide any information available to your office that would explain why Pierce County, Washington is the only county in that state not offering voting by mail.

### **USPS/PR-T1-4.**

At page 6, line 6 of your testimony, you state that Oregon uses “vote-by-mail exclusively.”

- (a) Please confirm that Oregon also requires that voters in each county be given the option of dropping off their completed ballots at designated places of deposit on Election Day.
- (b) What percentage of voters utilized this ballot deposit option in the most recent statewide election?
- (c) How many designated places of deposit were available in each county in Oregon for the November 2008 election?
- (d) What criteria are used to determine the number and location of such places for a given election?

### **USPS/PR-T1-5.**

Please refer to your testimony at page 8, lines 11-12 and provide a copy of the 2003 survey form and any related survey results and analysis. Please summarize your understanding of why 20 percent of survey respondents reacted negatively to the process of voting by mail.

### **USPS/PR-T1-6.**

Are “these kinds of problems” referenced at page 8, line 1 of your testimony the various matters listed on page 7 beginning at line 6?

## **USPS Interrogatories to PR witness Brown**

### **USPS/PR-T1-7.**

Please refer to your testimony at page 8, lines 17-19.

- (a) Indicate the time on election day by which mailed-in ballots must be in the custody of Oregon elections officials on Election Day in order for those ballots to be counted.
- (b) For each of the past five statewide elections for which you have records, please indicate the percentage of total mailed-in ballots delivered to elections officials by the Postal Service in the 48 hours before the voting deadline.

### **USPS/PR-T1-8.**

Please indicate the number of Oregon counties in which mail-in-ballots are mailed by voters to a county elections board:

- (a) street address;
- (b) Post Office Box address.

Of the counties identified in compiling your response to subpart (b), please indicate whether any election boards use postal Caller Service.

### **USPS/PR-T1-9.**

At page 8, lines 28-29 of your testimony, you express concern that higher mail volumes on a Monday before a Tuesday election resulting from the Postal Service's proposed service changes "would inevitably clog the process and slow down the processing of ballots." At page 4, lines 11-13, you explain that counties can begin processing, but not actually counting, ballots before Election Day. At lines 13-14 on that same page, you reveal that, during the last statewide election in Oregon, due to this ability to begin processing ballots before Election Day, Oregon officials "released more than three-quarters of the results within a half hour of the voting deadline." Please estimate roughly how many hours later election results would be released if the Postal Service puts its five-day proposal into effect.

### **USPS/PR-T1-10.**

Please refer to your testimony at page 8, lines 26-31 and describe the processing of mailed-in ballots by Oregon county or municipal elections officials that typically takes place:

- (a) on the Saturday before a Tuesday election;
- (b) on the Sunday before a Tuesday election;
- (c) on the Monday before a Tuesday election.
- (d) on election Tuesday before the voting deadline.