

**BEFORE THE
POSTAL REGULATORY COMMISSION**

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

Docket No. N2010-1

**RESPONSES OF NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO
WITNESS PRESIDENT FREDRIC V. ROLANDO TO INTERROGATORIES AND
DOCUMENT REQUESTS OF THE UNITED STATES POSTAL SERVICE
(USPS/NALC-T1-1 Through T1-12)**

The National Association of Letter Carriers, AFL-CIO hereby files the responses of witness President Fredric V. Rolando, NALC-T1, to the following interrogatories and document requests of the United States Postal Service, USPS/NALC-T1-1 through T1-12, filed on August 11, 2010.

Each interrogatory/document request is stated verbatim and followed by the response.

Respectfully submitted,

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RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-1

Please refer to the first paragraph of page 1 of your testimony.

- (a) **Please identify the postal competitors who routinely provide Saturday package delivery to residential customers who shop online. Explain in full the terms and conditions of such delivery service. In each case, compare those terms and services to a corresponding postal product.**
- (b) **Please confirm that residential postal customers today who are ordinarily not home during the day on weekdays may arrange for weekday re-delivery of an accountable package, either to their address on a weekday when they can be home for delivery or to an alternative address in the same ZIP Code where it can be signed for.**

RESPONSE:

- (a) I object to this interrogatory as it is irrelevant to any assertion made in the first paragraph of page 1 of my testimony. Notwithstanding that objection, I will respond, by stating that I do not know in full the terms and conditions of any such Saturday delivery service by postal competitors. Such information is far more likely to be in the possession of USPS, which presumably studies the services provided by its competitors. In any event, the point in my testimony was that if USPS stops delivering packages on Saturday, either current or future competitors will seek to capture that business.
- (b) I object to this interrogatory as it is irrelevant to any assertion made in the first paragraph of page 1 of my testimony. Notwithstanding that objection, I will respond by stating that I believe the statement in subpart (b) above is correct, although I am not certain. In any event, my recollection from when I delivered mail is that customers who requested re-delivery would typically request re-delivery for Saturday when they would be home.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-2:

Please refer to the first paragraph of page 1 of your testimony.

- (a) **Please confirm that “[m]any local businesses, like Main Street restaurants and retail stores, rely on their local home-town advertising mail to arrive” during in-home windows that can include Saturday.**
- (b) **Please estimate the percentage of customers of local small businesses today who plan their weekend shopping and outings *only after* the delivery of mail on Saturdays and provide the basis for your estimate.**

RESPONSE:

- (a) I object to this interrogatory as it is irrelevant to any assertion made in the first paragraph of page 1 of my testimony. I further object on the grounds that it is unclear what is meant by “in-home windows.” Notwithstanding these objections, I can confirm, as stated in my testimony, that many small businesses rely on their advertising mail arriving on Saturday. I do not know whether they may also target other days.
- (b) I object to this interrogatory as it is irrelevant to any assertion made in the first paragraph of page 1 of my testimony. Notwithstanding this objection, I will respond, by stating that I have no basis to provide such an estimate. However, I can speak from experience that many postal customers shop on Saturdays using advertising materials delivered in Saturday’s mail.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-3:

Please refer to your testimony at page 3, paragraph 2.

- (a) **Indicate the years during which you delivered mail to the shopping mall you describe.**
- (b) **Please describe and provide the results of all analysis you performed before your testimony was filed to determine whether the retail businesses in that mall are the same ones today as during the period specified in response to subpart (a).**
- (c) **Please describe and provide the results of all analysis that you performed before your testimony was filed to determine whether the promotional mailing practices of the retail stores at that mall today are the same today as during the period specified in response to subpart (a).**
- (d) **Please describe and provide the results of all analysis that you performed before your testimony was filed to determine whether the promotional mail generated by the retail stores at that mall today is deposited in the mail for delivery only on Saturdays or for delivery during an in-home window that includes both Friday and Saturday.**

RESPONSE:

- (a) From approximately 1988 to 1998.
- (b) I performed no such analysis.
- (c) I performed no such analysis, but I have no basis to believe that the mailing practices have changed or, more importantly, that such mailing practices are no longer common throughout the United States.
- (d) I performed no such analysis.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-4:

Please refer to paragraph 2 on page 4 of your testimony.

- (a) **Confirm that retirement homes are populated by residents who, by virtue of being retired, currently have the opportunity meet and greet their letter carrier up to six days a week in the current delivery environment.**
- (b) **Confirm that retirement homes are populated by residents who, by virtue of being retired, would have the opportunity meet and greet their letter carrier up to five days a week in the 5-day street delivery environment.**
- (c) **Compared to retirement home residents, would you agree that in both the current and the 5-day delivery environments, there is (or would) not generally be the same frequency of opportunity for other persons who reside “in every street in every village, town and city in America” to experience the same sort of connection between carrier and retirement home customer? If not, please explain.**

RESPONSE:

- (a) My knowledge of retirement homes does not extend beyond the limited personal experience referenced in my testimony. Accordingly, I have no basis to confirm or not whether residents of such homes have such an opportunity.
- (b) See response to subpart (a) above.
- (c) I object to this interrogatory on the basis that it is incomprehensible. Notwithstanding such objection, I would agree that people at home probably have more frequent opportunities to meet and greet their letter carrier than do people who work during the day.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-5:

Please refer to the final paragraph on page 4 of your testimony.

- (a) **Do you agree that the presence of the Postal Service can be felt and appreciated in communities throughout the nation if the quality of collection, retail, processing and delivery service is excellent, even if residential customers do not see their letter carriers on the street with great frequency?**
- (b) **All other things equal, which letter carrier's service is likely to be appreciated more: the letter carrier who provides mediocre service and is frequently seen by residents passing by or the letter carrier who provides excellent service but is rarely seen passing by?**

RESPONSE:

- (a) I agree that that is possible, but I believe that customers seeing their letter carriers and having the opportunity to meet and greet them, makes the Postal Service's presence felt in a unique and valuable way, and creates a particular bond with the customer. I believe that eliminating Saturday delivery will erode this bond with customers even assuming that underlying services were otherwise excellent.
- (b) I object to this interrogatory on the ground that it is argumentative and is not based on anything in my testimony; my testimony in the final paragraph of page four does not refer to quality of service. Notwithstanding these objections, I would agree that no customer appreciates mediocre service. But assuming the high-level of service that the Postal Service generally provides, I believe that letter carriers -- and the Postal Service -- are more appreciated if the letter carrier is seen frequently rather than rarely.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-6:

Please refer to the final paragraph on page 4 of your testimony. According to the Ponemon Institute study to which you refer, is the Postal Service's standing as the "most trusted government agency for privacy" attributed solely to the work of letter carriers, clerks, mail handlers, or managers; or is that standing attributed to the collective work of all postal employees? Please explain your response.

RESPONSE:

The study did not attribute USPS's standing to anything, as far as I can tell. My understanding is that the Postal Service's standing in the study was based simply on a certain number of survey respondents naming it as an entity that they trusted for privacy. Notwithstanding the survey, my belief is that letter carriers are the "face" of the Postal Service and that it is letter carriers who help create a bond of trust between the agency and its customers.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-7:

Please refer to the first full paragraph on page 5 of your testimony and provide copies of records in NALC's custody reflecting:

- (a) **the approximate number of registered Carrier Alert addresses;**
- (b) **data indicating the frequency by day-of-week with which Carrier Alert reports are submitted to social service agencies.**

RESPONSE:

- (a) NALC has no such records.

- (b) NALC has no such records.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-8:

Please refer to the first full paragraph on page 5 of your testimony.

- (a) **Please explain the methods through which NALC is informed of follow-up action taken by Carrier Alert social service agencies.**
- (b) **Please explain the criteria by which such follow-up action is judged to be life-saving.**

RESPONSE:

- (a) NALC is not informed of the follow-up action taken by social service agencies.
- (b) I do not know whether social service agencies may have criteria for judging whether follow-up action is life-saving or, if so, what those criteria may be. The statement in my testimony that in many cases the Carrier Alert program has saved lives comes from the *joint* NALC-USPS statement contained on the first page of NALC-LR-N2010-1/14.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-9:

- (a) **In reference to the five noble San Francisco letter carriers whose actions are described at the bottom of page 5 and top of page 6 of your testimony, would it be fair to say that they “joined forces” with retirement home employees already on the scene and local fire and rescue personnel who also arrived, and that “working together” the combined efforts of all involved resulted in 124 elderly residents being evacuated from the burning retirement home, with only one life lost. If not, please explain.**
- (b) **Please provide any insight you may have that might explain why the number of rescued residents would be reported as “nearly 100” by USA Today as opposed to “nearly 125.” See:**

http://www.usatoday.com/news/washington/2008-09-10-4210240401_x.htm

RESPONSE:

- (a) My knowledge of the incident comes from the *Postal Record* article contained in NALC-LR-N2010-1/15. The article does not state that the letter carriers worked together with retirement home employees and local fire and rescue personnel. Indeed, the article states that “[f]ire fighters soon arrived, but their work had been made a bit easier thanks to five letter carriers who had managed to complete the rescue portion of the operation.” In any event, whether the letter carriers in that particular incident worked by themselves or with others is entirely irrelevant to my larger point -- that removing letter carriers from the street an additional day per week will reduce the benefit that their presence provides to individuals and communities.
- (b) I have no insight on that, but whether the number rescued was “nearly 100” or “nearly 125” is entirely beside the point. One saved life would have been worth it.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-10:

Please provide copies of all hard-copy and electronic documents generated by, for, or in association with NALC that have been broadcast or otherwise disseminated for the purpose of appealing to NALC members and retirees, their families, members of another association or affiliated organization, and/or members of the general public to express their views by submitting comments to the Postal Regulatory Commission regarding the service changes under review in this docket. Please indicate the date on which each such appeal was first published, broadcast or disseminated, as well as the dates of subsequent communications directing the attention of readers to previously published appeals.

RESPONSE:

I object to this interrogatory. What communications NALC may have had with others is not relevant to the subject matter of the proceeding. What is relevant to this proceeding is USPS's proposed service changes, including whether or not such service changes will have the financial and operational impacts that USPS projects.

Moreover, to require NALC to reveal its communications with its members and others regarding a matter of critical public concern would chill and burden NALC's exercise of its First Amendment rights.

Finally, to the extent NALC has engaged in extensive communications on this important matter with its members and others, producing *all* such documents -- whether hard-copy or electronic, and whether made "by, for, or in association with" NALC -- would be an enormous and unduly burdensome task, the burden of which would far outweigh any possible tangential probative value the documents produced would have on this proceeding.

This objection notwithstanding, I would state that NALC believes it is important that members of the public know that they have an opportunity to express their views to the Commission.

I further note that NALC's website contains ample public information regarding NALC's nationwide campaign in opposition to USPS's proposed elimination of Saturday delivery. *See*

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
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<http://www.nalc.org>. The website includes NALC's public request that people "[p]lease write to the Postal Regulatory Commission and submit a comment in support of Saturday delivery."

See <http://www.nalc.org/postal/reform/index.html#comment>

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-11:

Please refer to the final paragraph on page 9 of your testimony. Is it the mere presence of postal clerks at postal retail windows and the mere presence of letter carriers on the street or the quality service that clerks and carriers provide that forms the core of the “key connection” between the Postal Service and its customers?

RESPONSE:

I object to the form of this interrogatory and also to its argumentative nature. Notwithstanding such objection, I would state that the “key connection” referred to in the last paragraph of my testimony is the connection between the Postal Service and its customers created by the letter carrier delivering mail to the customer, and also created by all the positive contributions that letter carriers make in their communities, as explained in my testimony.

RESPONSE OF NALC WITNESS PRESIDENT FREDRIC V. ROLANDO (NALC-T1) TO
USPS INTERROGATORY

USPS/NALC-T1-12:

Please refer to the final two paragraphs on page 6 of your testimony.

- (a) Please summarize the discussions or negotiations between NALC and the Postal Service that led to the agreement that NALC would conduct its annual food drive on a Saturday, as opposed to another day of the week.**
- (b) Please confirm that other charitable programs in the United States that successfully depend on household residents to donate household items by leaving them on front porches or outside front doors for pick-up operate local collection activities on days other than Saturdays. If you are unable to confirm, please explain.**

RESPONSE:

- (a) I have no knowledge regarding any such discussions or negotiations. However, it is self-evident to me that the parties would agree to hold the Food Drive on a Saturday, which is the day that would produce the best results.
- (b) I have no knowledge regarding the days on which other charitable programs may operate. However, I know of no other organization that has collected over one billion pounds of food in the last 17 years.