

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

Retail Access Optimization Initiative

Docket No. N2011-1

October 12, 2011

**Objections and Partial Objections of  
National League of Postmasters to USPS  
Discovery Requests USPS/NLP RT 7,8,10,11,14,15(b),17,18,20,  
33,36,38(c),42,43(b)-(f),48(c)-(e),49,51(b) and (d),52, and 54(c) and(d)**

Pursuant to Rules 26 and 27 of the Commission's Rules of Practices, the National League of Postmasters (the "LEAGUE") respectfully objects wholly or in part to the United States Postal Service discovery requests USPS/NLP 7, 8, 10, 11, 14, 15(b), 17, 18, 20, 33, 36, 38(c), 42, 43(b)-(f), 48(c)-(e), 49, 51(b) and (d), 52, and 54(c) and(d). These questions were served by the Postal Service on October 3, 2011. The LEAGUE respectfully reserves the right to supplement its objections or raise additional objections in the course of responding to these requests.

**GENERAL OBJECTIONS**

1. Each of these General Objections is incorporated below into each and every Response as if set forth fully therein. Certain of those Responses restate the substance

of certain General Objections for emphasis only. Regardless of whether or to what extent any of those Responses restate the substance of any General Objection, all of the General Objections are intended to be and are incorporated into and set forth as part of each Response.

2. The LEAGUE objects to the Interrogatories to the extent that they seek information relating to business/personal transactions that are not at issue in this proceeding. As such, the Interrogatories have been propounded for an improper purpose, and, on this ground, are unduly burdensome and oppressive, and constitute annoyance and harassment.

3. The LEAGUE objects to the Interrogatories to the extent that they purport to impose requirements, tasks, duties, or obligations on the LEAGUE that are contrary to or exceed those authorized by the governing rules of procedure.

4. The LEAGUE objects to the Interrogatories, and to each individual interrogatory and request contained therein, to the extent that one or more of the individual interrogatories and/or requests seeks documents or information that is duplicative or cumulative of documents or information sought by one or more of the individual interrogatories and/or requests.

5. The LEAGUE objects to the Interrogatories, and to each individual interrogatory and request contained therein, to the extent that they purport to require the LEAGUE to provide information concerning persons or entities other than the LEAGUE, on the

grounds that the Interrogatories and Requests, to that extent, are overbroad and seek information that is neither relevant to the subject matter.

6. The LEAGUE objects to the Interrogatories and Requests, and to each individual interrogatory and request contained therein, to the extent that they purport to require the LEAGUE to disclose privileged, confidential, proprietary, or sensitive information of the LEAGUE or third parties. Any such information produced here is only for the purposes of the present proceeding, and does not otherwise affect the privilege or confidentiality of the information.

7. The LEAGUE objects to the Interrogatories and Requests, and to each individual interrogatory and request contained therein, to the extent that they seek information not presently known or reasonably available to the LEAGUE, and thereby unduly burdensome and oppressive.

8. To the extent that any of the Interrogatories and/or Requests call for information already in the possession, custody, or control of Postal Service and their counsel, the LEAGUE objects on the grounds that the Interrogatories and/or Requests are unnecessary, unduly burdensome, and oppressive, and constitute annoyance and harassment.

9. The LEAGUE objects to each and every Interrogatory to the extent that it seeks information that is within the possession, custody, or control of, or equally or more available to Postal Service.

10. The LEAGUE objects to each and every Interrogatory to the extent that it seeks information or documents not within the LEAGUE's possession, custody, or control.

11. The LEAGUE objects to each and every Interrogatory to the extent that it seeks information and/or documents that are not relevant to the RAO Initiative proceeding.

12. The LEAGUE objects to each and every Interrogatory to the extent that it is vague, ambiguous, overly broad, unduly burdensome, harassing, duplicative, compound, seeks information or documents that are not identified with reasonable particularity, and/or otherwise seeks to impose upon the LEAGUE any obligations beyond those imposed by the Rules of Practice and Procedure.

13. The LEAGUE objects to each and every Interrogatory to the extent that it assumes facts not in evidence.

14. The LEAGUE objects to each and every Interrogatory to the extent that it does not specify a time frame.

15. The LEAGUE objects to each and every Interrogatory to the extent that it seeks improperly to impose upon the LEAGUE the burden of gathering electronically stored information or documents from an electronic archival system or that must be restored from back-up tapes.

16. The LEAGUE objects to the Definitions and Instructions set forth in the Interrogatories to the extent they seek to impose obligations on LEAGUE beyond those imposed by the Rules of Practice and Procedure.

17. The LEAGUE objects to the Interrogatories to the extent they seek to impose obligations upon the LEAGUE that are inconsistent with the Commission's scheduling orders.

18. The LEAGUE objects to any Postal Service Instructions or Definitions that could be construed to require the LEAGUE to answer questions or produce materials that are not reasonably calculated to lead to the discovery of admissible evidence; unduly burdensome; that would require the production of material protected by the attorney-client privilege, the attorney work-product privilege, trade secret privilege, or any other privilege; or otherwise do not conform with the Commission's discovery standards as set forth in Rules 26 through 28 of the Commission's Rules of Practice.

19. The LEAGUE objects to each Interrogatory on the basis that such is vague and ambiguous to the extent it seeks information or items that "relate to," "support," "evidence," "describe," "mention," "refer to," "pertain to," "contradict," "compromise," or "relate to" facts or contentions for the reason that such terms, or their equivalents, do not describe the information sought with sufficient particularity to allow the LEAGUE to reasonably respond to such requests.

## **SPECIFIC OBJECTIONS**

### **USPS/NPLM-RT1-7**

In relation to your term of your service as Postmaster of Prescott, Arizona, which you mention on page 4, line 3 of your testimony, please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.

- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment. This interrogatory is requesting Mr. Strong to create a map, which places an undue burden, especially considering the time constraints of this proceeding. The Postal Service can perform the research needed to answer this question with no more difficulty than the LEAGUE could. If the Postal Service wishes to prepare or produce a suitable map relating to the above interrogatory, Mr. Strong is willing and able to confirm or deny the above information with respect to said map.

**USPS/NLPM-RT1-8**

In relation to your term of your service as Postmaster of Glendale, Arizona, which you mention on page 4, line 4 of your testimony. Please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.
- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment. This interrogatory is requesting Mr. Strong to create a map, which places an undue burden, especially considering the time constraints of this proceeding. The Postal Service can perform the research needed to answer this question with no more difficulty than the LEAGUE could. If the Postal Service wishes to prepare or produce a suitable map relating to the above interrogatory, Mr. Strong is willing and able to confirm or deny the above information with respect to said map.

**USPS/NLPM-RT1-10**

In relation to your service as Postmaster of Sun City, Arizona, which you mention on page 3, lines 4-6 of your testimony, please provide a map showing:

- (a) The geographic area served by delivery carriers reporting to you as a Postmaster or to subordinate units under your command.
- (b) Identification of any stations, branches, or contract postal units reporting to you as a Postmaster.
- (c) Identification of areas served by Rural or Highway Contract Route carriers (the routes themselves need not be marked).
- (d) The approximate farthest distance that a customer in the geographic area identified in part (a) would have to travel from a residence to a Postal Service operated retail facility.
- (d) Please also state whether, as a result of your day-to-day responsibilities as an officer of the National League of Postmasters, the day-to-day responsibilities of Sun City AZ Postmaster have been or currently are the responsibility of another postal employee at that office.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment. This interrogatory is requesting Mr. Strong to create a map, which places an undue burden, especially considering the time constraints of this proceeding. The Postal Service can perform the research needed to answer this question with no more difficulty than the LEAGUE could. If the Postal Service wishes to prepare or produce a suitable map relating to the above interrogatory, Mr. Strong is willing and able to confirm or deny the above information with respect to said map.

With respect to the second (d), this interrogatory seeks information relating to business/personal transactions that are not at issue in this proceeding.

**USPS/NLPM-RT1-11**

Please refer to your testimony at page 4, line 14 and state whether the day-to-day duties of Avondale/Goodyear AZ Postmaster currently are the responsibility of a postal employee other than the one identified in your testimony. If so, please explain.

**OBJECTION:**

This interrogatory seeks information and/or documents that are not relevant to the RAO Initiative proceeding. This interrogatory also requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-14**

Please refer to your testimony at page 5, lines 15-18. Please provide a copy of any official postal document containing the "nonsense" statement referenced there. In the alternative, please provide a copy of and citation (including internet links) to published accounts of the statement. If the statement was uttered orally, please provide the name and job title of the speaker, and indicate the date on which and the audience to whom the statement was uttered.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-15**

- (a) Please refer to your testimony at page 9, line 7. Identify the "basic" public policy with which the Retail Access Optimization Initiative conflicts and explain how it is conflicts with that policy.
- (b) In your view, what accounts for the failure of the Postal Regulatory Commission to opine in its Docket No. N2009-1 advisory opinion that the Station and Branch Optimization and Consolidation Initiative conflicted with that same "basic" public policy?

**OBJECTION:**

Part (b) seeks information and/or documents that are not relevant to the RAO Initiative proceeding. It also seeks information or documents not within the LEAGUE's possession, custody, or control.

**USPS/NLPM-RT1-17**

Please refer to your testimony at page 14, lines 16-18.

- (a) Please identify the specific offices that any Vice President from USPS Headquarters directed be closed as part of the RAO Initiative by the date that your testimony was filed.

- (b) Please confirm that it is your understanding that the retail optimization initiative reviewed by the Postal Regulatory Commission in Docket No. N2009-1 utilized the USPS Handbook PO-101. If you do not confirm, please explain.
- (c) Please confirm that it is your understanding that the retail optimization initiative reviewed by the Postal Regulatory Commission in Docket No. N2009-1 was a top-down initiative. If you do not confirm, please explain.
- (d) To your knowledge, how many of the over 3000 stations and branches reviewed for discontinuance as part of the above-referenced Docket No. N2009-1 initiative were eliminated from consideration for discontinuance on the basis of recommendations from District discontinuance review teams?
- (e) Please review Docket No. N2009-1, USPS Library Reference N2009-1/4. To your knowledge, how many USPS District Managers were subjected to or currently are under threat of adverse career consequences resulting from the fact that the percentage of the over 3000 SBOC candidate facilities not recommended for discontinuance greatly exceeded the five percent of SBOC candidate stations and branches ultimately discontinued?

**OBJECTION:**

Parts (a), (d), and (e) of this interrogatory request information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

Parts (b) –(e) seek information and/or documents that are not relevant to the RAO Initiative proceeding, and seeks information or documents not within the LEAGUE’s possession, custody, or control.

**USPS/NLPM-RT1-18**

Please refer to your testimony at page 15, lines 2-7 and the USPS Handbook PO-101. Please explain your understanding of which administrative level of Postal Service management initiates discontinuance studies and then submits them to the Area Office and Headquarters for review.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-20**

Please refer to your testimony at page 16, line 21. What percentage of rural Post Office customers visit the office every day that it is open. Please provide the data supporting that figure and describe how they were tabulated.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-33**

At page 11, lines 7-16 of your testimony, you state and quote from a website the following passage: "Even today, in the 'information age,' post offices: 'serve as a community anchor and hub, they give a place an identity, they support small businesses by providing easy access and low mailing costs, they bring foot-traffic into nearby stores and restaurants, they save countless miles of driving time and fuel by serving as nodes on a vast network, they provide services that no Wal-Mart postal counter can do (like passports and emergency preparedness), they are often housed in beautiful historic buildings that are a source of local pride, and they represent the presence of the federal government in every community and remind people that the government is capable of doing some things right.

- (a) Do you know how many Post Offices (excluding stations and branches) that are part of the RAO Initiative currently provide passport services? If your answer is affirmative, please provide that number. If you do not know, what percentage of Post Offices would you estimate provide passport services?
- (b) If your answer to part (a) is negative, what research did you conduct on the

- provision of passport services at Post Offices that are part of the RAO initiative?
- (c) Please identify all of the emergency preparedness services that are provided at Post Offices, and identify the source of authority that directs Post Office managers to conduct such emergency preparedness activities.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-36**

Please explain how the text of the email copied on page 29 of your testimony supports the assertion that "the Postal Service has been taking steps that both hinder meaningful community input, while simultaneously cutting off post offices as though the decision to close them has already been made." In doing so, explain whose decision it was not to refer to the email in USPS Library Reference N2011-1/16 that was responsive to the one you quote on page 29. Please attach a copy of the responsive email in your response to this interrogatory.

**OBJECTION:**

The quoted material is self-explanatory. This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-38**

Your testimony states at page 12, line 6 that "Many small rural post offices have already closed."

- (a) What is the source of this claim?
- (b) How many Post Offices were discontinued between 1996 and 2009?

- (c) For purposes of the questions below, a "management-initiated" discontinuance action means a discontinuance action where management conducts a feasibility study and discontinuance action due to a Postmaster vacancy.
- (i) Please confirm that Postal Service management did not initiate any management initiated discontinuance actions of Post Offices between 2002 and 2008. If not confirmed, please explain your response.
  - (ii) Please confirm that you or your predecessors were personally involved in discussions with Postal Service management relating to decisions not to pursue management-initiated Post Office closings between 2002 and 2008. If not confirmed, please explain your response.

**OBJECTION:**

Part (c) of this interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-42**

At page 13 of your testimony, you state:

Rural post offices currently provide the following services: stamps, First Class Mail (domestic and international), Priority Mail, Priority Flat Rate Boxes/Envelopes, Express Mail, Certified Mail, Registered Mail, return receipt, Insured Mail, Certificate of Mailing, restricted delivery, collect on delivery, special handling, adult signature required, media mail, parcel post, money orders, signature confirmation, delivery confirmation, bulk mail acceptance, zip code information, international mail, customs forms, file a change of address, stamped envelopes and postcards, Ready Post products and supplies, Sure Money, mailing requirements, file an insurance claim and safe and secure mail box services.

- (a) Identify the services in the list in the quoted passage above that are never provided by rural carriers while serving customers on a rural route.
- (b) Identify the services in the list in the quoted passage above that are never provided by Highway Contract Route carriers while serving customers on their routes.
- (c) Identify the services in the list in the quoted passage above that are never provided by contractor-operated community post offices.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-T1-43**

On page 20, lines 5-15, you refer to a Gallup poll recounting the public's opposition to Post Office discontinuance.

- (a) Did you participate in the survey design or direct the conduct of the survey?
- (b) Please provide the following: a description of the study plan underpinning the survey described in your testimony, a clear description of the study design, all relevant assumptions underpinning the survey, the techniques or procedures used to compile the data, the definition of the universe under study, and the sampling frame and units surveyed.
- (c) Please provide the following: the date (month, day, and year) on which the survey began and the date (month, day, and year) on which the survey ended (i.e., the survey period).
- (d) Please provide a complete copy of the survey, including all questions posed to survey participants, all instructions provided to survey participants, and, if available to you, complete copies of the individual survey responses received from participants. Names of specific individuals may be redacted.
- (e) Please provide the total number of persons who were provided with an opportunity to participate in the survey
- (f) Please state your understanding of the extent to which the Gallup survey referenced on pages 20-21 of your testimony sought customer reactions to the closure of a local post office branch in the context of a determination that a nearby postal location in combination with one or more alternate access sites were deemed capable of providing the postal services they sought.

**OBJECTION:**

Parts (b) – (f) of this interrogatory seek information or documents not within the LEAGUE's possession, custody, or control.

**USPS/NLPM-RT1-48**

At page 28, lines 1-5 of your testimony, you state, "the fact that the methodology used to calculate other hours is fundamentally flawed, resulting in the data being skewed. The bottom line of this is that the output from the formulas is highly unreliable and should not be used for the type of evaluative purposes that they are being used for here."

- (a) What specific data in particular do you consider to be "fundamentally flawed"?
- (b) What specific data do you consider to be "skewed"?
- (c) Do local Post Office discontinuance officials fail to consider other factors in conducting a discontinuance feasibility study other than the data you identify in parts (a) and (b)?
- (d) If your answer to part (c) is affirmative, then do you claim that local officials are not following the requirements of Handbook PO-101 in gathering and considering information received in connection with Post Office discontinuance studies?
- (e) If your answer to part (c) is negative, then what other types of information do local Post Office discontinuance officials consider?

**OBJECTION:**

Parts (c) – (e) of this interrogatory request information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-49**

At page. 14, lines 2-4 of your testimony, you state "A United States citizen in a rural town would not have reasonable access to postal services enabling him or her to send a care package, or to purchase a money order to pay a bill."

- (a) Do you deny that Rural or Highway Contract Route carriers may retrieve packages for mailing from customers through their mailboxes or collection box units?
- (b) Do you deny that Rural or Highway Contract Route carriers may sell money orders by collecting funds and instructions from customers?
- (c) Did Rural and Highway Contract Route carriers reporting to you or your subordinates when you served as a Postmaster retrieve, while serving their routes, packages for mailing from customers?
- (d) Did Rural and Highway Contract Route carriers reporting to you or your subordinates when you served as a Postmaster sell money orders?

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-51**

At page 14 of your testimony, you state, "with the new top-down approach and a Vice President from Headquarters giving the directive to close offices, very few District Managers will ever push back to challenge such a Headquarters decision."

- (a) Did you review Handbook PO-101 revised as of July 2011 prior to finalizing your testimony?
- (b) If your answer to part (a) is affirmative, identify the sections of the Handbook PO-101 that you reviewed that identify a role for a Headquarters Vice President, and briefly describe what those sections say.
- (c) Do you claim that the "top-down" approach provides that a Headquarters Vice President directs the closing of Post Offices by directing field managers to close them? If your answer is affirmative, please explain your response.
- (d) Please confirm, with citations to the current Handbook PO-101, the role that a Headquarters Vice President exercises in connection with the discontinuance of a Post Office, including (i) the initiation of the study of a retail facility for possible discontinuance action, and (ii) the review and signing of a final determination prepared by field management.

**OBJECTION:**

Parts (b) and (d) of this interrogatory request information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment. The Postal

Service knows, or should know, what the various sections of Handbook PO-101 provide with regard to the roles and responsibilities of a Headquarters Vice President.

**USPS/NLPM-RT1-52**

At pages 14-15 of your testimony, you state, "It just wouldn't be a good career move. In fact, what used to be a District Manager-directed initiative now requires that any change to the top-down request requires a minimum of an Area Vice President's approval before a discontinuance is stopped."

- (a) Identify the sections of the current USPS Handbook PO-101 that identify a role for a Area Vice President, and describe briefly what those sections say.
- (b) Please confirm that the current USPS Handbook PO-101 identifies a role for an Area Vice President to approve any change to a "top-down" request for the initiation of a feasibility study. If you do not confirm, then please explain your response.

**OBJECTION:**

This interrogatory requests information already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

**USPS/NLPM-RT1-54**

At page 18, lines 7-9 of your testimony, you describe the experience of Jerome, Arizona, which transformed itself into a thriving arts community, and David, Kentucky, which revitalized itself.

- (a) Identify records or other information that you reviewed that attribute each community's transformation to the presence of a Post Office, and provide copies of such records or information.
- (b) Over what period of time did each transformation occur?
- (c) What was the average number of daily retail transactions at each Post Office for the fiscal year prior to the transformation?
- (d) What was the average number of daily retail transactions at each Post Office for the fiscal year after the transformation?

**OBJECTION:**

Parts (c) and (d) of this interrogatory request information about daily retail transactions at post offices that is already in the possession, custody, or control of Postal Service and their counsel, or information that is equally or more readily available to the Postal Service, and is therefore unnecessary, unduly burdensome, and oppressive, and constitutes annoyance and harassment.

Respectfully submitted this 11<sup>th</sup> day of October, 2011.

/s/ Robert J. Brinkman

Robert J. Brinkmann  
Law Offices of Robert J. Brinkmann LLC  
1730 M St. N.W. Suite 200  
Washington, D.C. 20036  
202-331-3037; 202.331-3029 (f)  
[robert.brinkmann@rjbrinkmann.com](mailto:robert.brinkmann@rjbrinkmann.com)

/s/ Harold Hughes

Harold Hughes  
Michelle Bushman  
Ford & Huff LC  
10542 South Jordan Gateway, Suite 300  
South Jordan, Utah 84095  
801-407-8555  
[hal.hughes@fordhuff.com](mailto:hal.hughes@fordhuff.com)

*Counsel for the National League of  
Postmasters of the United States*

---

## CERTIFICATE OF SERVICE

I hereby certify that a copy of these Responses has been served on the United States Postal Service at the following address on this 11th day of October, 2011:

Michael T. Tidwell  
Attorney for United States Postal Service  
[michael.t.tidwell@usps.gov](mailto:michael.t.tidwell@usps.gov)

/s/ Michelle Bushman

Ford & Huff LC  
South Jordan Gateway, Suite 300  
South Jordan, Utah 84095  
801-407-8555  
[michelle.bushman@fordhuff.com](mailto:michelle.bushman@fordhuff.com)