

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

Postal Regulatory Commission
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MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

DOCKET No. N2012-1

**DISCOVERY REQUESTS OF THE NATIONAL ASSOCIATION
OF LETTER CARRIERS, AFL-CIO TO USPS WITNESS MICHAEL D.
BRADLEY
(NALC/USPS-T10: 2)
(January 17, 2012)**

Pursuant to Rules 26 and 27 of the Postal Regulatory Commission's
Rules of Practice, the National Association of Letter Carriers, AFL-CIO ("NALC")
propounds the following requests upon USPS witness Michael D. Bradley (USPS-T10).

Respectfully submitted,

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Instructions and Definitions:

1. Each of the following discovery requests is continuing in nature. NALC requests that if you obtain any additional responsive information at any later date, you promptly submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any requested data, information, or documents requested, please describe the privilege and the data, information or documents to which you contend it applies.
3. If in response to any discovery request you are unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.
4. If an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.
5. The term “USPS” includes all agents, employees, officers, directors, attorneys and representatives of USPS, and anyone acting on its behalf, as well as the Board of Governors and the USPS Office of Inspector General.
6. The terms “document” or “documents” include but are not limited to the original or a copy of any letter, email, note, spreadsheet, memorandum, directive, report, study, meeting minutes, contract, diary entry or schedule, presentation, print out, speech, testimony, pamphlet, chart, tabulation, workpaper, draft, recording, and other writing or retrievable data of whatever kind or nature to which USPS has access, regardless of origin or location, and whether in hardcopy or electronic form, handwritten or typed.
7. If an objection is made to a request on the ground that to provide the requested discovery would constitute an undue burden, provide all requested information that can be supplied without undertaking what is claimed an undue burden.

Request:

NALC/USPS-T10-1:

On page 11, line 16 of your testimony, you set forth an equation that refers to “Work Load.” Please explain how you defined and measured “Work Load” for purposes of this equation?

NALC/USPS-T10-2:

The percentages on Tables 2 and 3 of your testimony (pages 13-14) do not match the percentages on Table 4 (page 17). For example, Table 2 lists the percentage of BCS/DBCS as 22% but Table 4 lists it as 18%. Please explain the basis for this difference.