

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 REBECCA ELMORE-
YALCH
(NALC/USPS-T11: 1-5)
(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 Rebecca Elmore-Yalch (USPS-T11).

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.

Requests:

NALC/USPS-T11-1:

Figure 41 on page 49 of your testimony shows that a “probability of change” scale was used in calculating the estimated change in mail volume that would result from the proposed service standard changes. Please state by how much USPS’s estimate of mail volume change of 1.7% would be different if the “probability of change” scale had not been used and explain how you calculated that difference.

NALC/USPS-T11-2:

Figure 41 on page 49 of your testimony shows that a “% of Increase/Decrease in Volume Solely Attributable to Change to FCM Standards” factor was used in calculating the estimated change in mail volume that would result from the proposed service standard changes. Please state by how much USPS’s estimate of mail volume change of 1.7% would be different if that factor had not been used and explain how you calculated that difference.

NALC/USPS-T11-3:

Please state by how much USPS’s estimate of mail volume change of 1.7% would be different if neither the “probability of change” scale nor the “% of Increase/Decrease in Volume Solely Attributable to Change to FCM Standards” factor had been used and explain how you calculated that difference.

NALC/USPS-T11-4:

Page 15, lines 12-20 of your testimony lists five different business segments. Please provide for each segment the (1) mean reported volume decline for respondents in that segment; (2) the mean “probability of change” score for respondents in that segment; and (3) the correlation between the mean reported volume decline and the mean “probability of change” score for respondents in that segment.

NALC/USPS-T11-5:

Please provide the time period during which you conducted the quantitative market research referred to in your testimony.