

BEFORE THE
POSTAL REGULATORY COMMISSION
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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 STEPHEN MASSE
(NALC/USPS-T2: 1-6)
(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 Stephen Masse (USPS-T2).

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-T2-1:

On page 12, line 3 of your testimony, you state that “the net annualized savings will take time to be realized fully.” Does USPS have an estimate of how long it will take for the net annualized savings to be realized fully? If so, please explain the basis for such estimate.

NALC/USPS-T2-2:

On page 12, line 4 of your testimony, you refer to “implementation expenses.” Please explain what these implementation expenses are, provide any estimate that USPS has of the amount of these expenses, and explain how USPS arrived at such estimate.

NALC/USPS-T2-3:

Did USPS make any effort to measure or estimate the transition costs that USPS would incur in its implementation of the proposed mail processing network rationalization? If so, please provide these measures or estimates and explain how USPS arrived at them.

NALC/USPS-T2-4:

Has USPS made an inquiry into, or undertaken any study of, what it would require in terms of time, effort and expense to reverse the proposed mail processing network rationalization if, after implementation, it turns out that USPS’s estimate of the net annualized savings was a gross underestimate?

NALC/USPS-T2-5:

Did USPS conduct, or request anyone else to conduct, any econometric studies in connection with USPS’s effort to assess how much the proposed mail processing network rationalization service changes would reduce demand for USPS’s services or would reduce mail volume, revenue or contribution? If not, why not? If yes, please provide copies of such studies.

NALC/USPS-T2-6:

Do you agree with the statement that “[i]n the long term, the Postal Service is best served by a focus on additional ways to add value to customers and other stakeholders such as employees”? (Sept. 23, 2010 testimony of Dr. Peter Boatwright on behalf of USPS, in Docket No. N2010-1, page 27, lines 19-20). If so, in what ways, if any, does USPS plan to add value to customers and other stakeholders?