

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

CITY OF NEW ORLEANS' FIRST SET  
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
UNITED STATES POSTAL SERVICE

(February 24, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the City of New Orleans hereby submits the following interrogatories and requests for production of documents.

(CNO/USPS-1-7)

The City of New Orleans encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Richard F. Cortizas

City Attorney  
City of New Orleans

## **DEFINITIONS AND INSTRUCTIONS**

A. Each of the following discovery requests is continuing in nature and the City of New Orleans requests that if you obtain any additional responsive information or documents at any later date, you promptly so inform the City of New Orleans and submit supplemental or amended answers and documents.

B. If privilege is claimed with respect to any data, information, or documents requested herein, the party to whom the discovery request is directed should provide a privilege log. Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

C. If in response to any discovery request the Postal Service is unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.

D. In responding to any questions contained in the attached discovery requests that require any calculations, analysis, assumptions, or studies that have been prepared, please provide and identify electronic copies in spreadsheet format of such calculations, analysis, assumptions, studies, and all workpapers that relate to the response.

E. If an objection is made to only a part of a discovery request, please answer the remainder of the request.

F. If data or information is not available in the exact format or level of detail requested, please provide such data or information (1) in a substantially similar format or level of detail or (2) in a format susceptible to being converted to the requested format and level of detail.

G. The term “Postal Service” includes all agents, employees, officers, directors, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors, and subcontractors to the Postal Service.

H. The terms “document” or “documents” are synonymous in meaning and equal in scope to the usage of the terms as defined by 16 CFR 3.34(b), including but 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 or whatever kind or nature to which the Postal Service has or has had access to, regardless of origin or location, hardcopy or electronic, handwritten or typed. Documents should be produced in the way they are maintained.

I. The term “describe” means to detail in full, with specificity, the event or situation at issue.

J. The term “identify,” (1) when used with regard to a person, means to provide the full name and position of the person, and (2) when used with regard to a document means to describe the subject matter of the document, its author, the date, and any intended recipients.

K. The term “communication(s)” means the transmittal of information by any means and includes communications or any kind, whether written, oral, electronic, or other.

L. All “documents,” as defined above, responsive to discovery requests that can be located, discovered or obtained by reasonably diligent efforts, including without limitation all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand, should be produced.

M. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

N. The term “workpapers” includes all backup material whether prepared manually, mechanically or electronically. Such workpapers should, if necessary, be prepared as part of the witness’s responses and should allow a third party to understand how the witness took data from a primary source and developed that data to achieve a final result. If Excel-type spreadsheets are used, please provide a version of the worksheets that include the underlying formulas for each cell.

O. The term “New Orleans Processing and Distribution Facility” means the USPS facility located at 701 Loyola Ave, New Orleans, LA 70113

P. Unless otherwise noted, all postal related terms have the definitions of the current version of the Postal Service’s Publication 32 – Glossary of Postal Terms.

## INTERROGATORIES

### CNO/USPS-1

Please refer to page 34 of USPS-T-3, row 333 of the spreadsheet provided in USPS Library Reference N2012-1/34, and the September 15 “study list.”

- (a) Please confirm that the New Orleans Processing and Distribution Facility was identified as an activated facility in witness Rosenberg’s model. If not confirmed, please explain fully.
- (b) Please provide technical and plain English definitions of “activated facility” as used in witness Rosenberg’s testimony.
- (c) Please confirm that the New Orleans Processing and Distribution Facility was identified as a “study site” on the September 15 study list.
- (d) Please identify all facilities that were both (i) identified as activated facilities in witness Rosenberg’s model and (ii) on the September 15 study list.
- (e) Please explain fully why the Postal Service decided to include the New Orleans Processing and Distribution Facility as a study site on the September 15 study list despite being identified as an activated facility in witness Rosenberg’s model. In particular, please identify: (i) all employees involved in making the decision; (ii) the date the decision was made; and (iii) the rationale for the decision.

### CNO/USPS-2

Please identify by title, subject matter, author, geographic location and date (at a minimum) all Area Mail Processing studies that have been conducted on the New Orleans Processing and Distribution Facility. For each identified AMP study, indicate whether the study was performed as part of the proposed Mail Processing Network Rationalization initiative.

### CNO/USPS-3

For each study identified in CNO/USPS-2 above, please identify and describe:

- Factor(s) that may have contributed to the decision to study the New Orleans Processing and Distribution Facility;
- Results of the study;

- Whether the study considered consolidating or closing the facility with respect to originating mail, destinating mail, or both;
- Any data or analysis that may suggest that the New Orleans Processing and Distribution Facility should not be consolidated or closed;
- Whether and to what extent the study considered and/or analyzed the cost of relocating existing retail and business services located within the New Orleans Processing and Distribution Facility; and
- Projected or estimated cost savings that may be realized by closing or consolidating the New Orleans Processing and Distribution Facility, if any.
- Key assumptions used to estimate the cost savings that may be realized by closing or consolidating the New Orleans Processing and Distribution Facility.
- All assumptions regarding expected changes in productivity that would result from closing or consolidating the New Orleans Processing and Distribution Facility.

#### **CNO/USPS-4**

Please describe the decision making process for consolidation and closures associated with the proposed Mail Processing Network Rationalization Service Changes, including the involvement by and interaction among (1) the US Postal Service executive leadership team, (2) the Postal Service Board of Governors, and (3) the Postal Regulatory Commission.

## **REQUESTS FOR PRODUCTION**

### **CNO/USPS-5**

Please produce any and all documents, including but not limited to communications and work papers, which were reviewed, considered or generated in connection with the decision (discussed in CNO/USPS-1) to include the New Orleans Processing and Distribution Facility on the September 15 study list despite the facility being identified as an activated facility by witness Rosenberg.

### **CNO/USPS-6**

Please produce any and all Area Mail Processing studies identified in CNO/USPS-2.

### **CNO/USPS-7**

Please produce any and all documents, including but not limited to communications and work papers, which were reviewed, considered or generated in connection with any and all Area Mail Processing studies identified in CNO/USPS-2. Please provide all workpapers and other spreadsheets in an electronic format that includes the formulae used to perform the calculations.