

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

MAIL PROCESSING NETWORK)
RATIONALIZATION SERVICE CHANGES, 2012) Docket No. N2012-1
)

**UNITED STATES POSTAL SERVICE INTERROGATORIES TO POSTAL
REGULATORY COMMISSION WITNESS HAROLD J. MATZ (PRC-T-2)
(USPS/PRC-T2—1 - 6)
(May 21, 2012)**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's
Rules of Practice and Procedure, the Postal Service respectfully submits the
following interrogatories to Postal Regulatory Commission Witness Harold J.
Matz (PRC-T-2).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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DEFINITIONS

1. “Communication” means any correspondence, contact, discussion or exchange between any two or more persons. The term includes, but is not limited to, all documents, telephone conversations or face-to-face conversations, electronic mail, conferences or other meetings.

2. “Document” means any written, recorded, computer-stored, computer-generated or graphic material however stored, produced or reproduced. The term is to be construed to the full extent of the definition in Rule 34 of the Federal Rules of Civil Procedure. Any document that is not exactly identical to another document for any reason, including but not limited to marginal notations or deletions, is a separate document.

3. “Each” includes the term “every” and “every” includes the term “each.” “Any” includes the term “all” and “all” includes the term “any.” “And” includes the term “or” and “or” includes the term “and.”

4. “Identify” means to state as follows:

- (a) With respect to a document and to the extent that the following information is not readily apparent from the document itself: (i) the document’s title, date, author(s), signer(s), sender(s), addressee(s) and recipient(s); (ii) the type of document (e.g. letter, memorandum, agreement, invoice) its location and custodian; and (iii) a detailed description of its contents or principal terms and provisions.
- (b) With respect to a communication and to the extent the following

information is not readily apparent: (i) the time, date and place of the communication; (ii) all maker(s) and recipient(s) of the communication; (iii) the mode of communication; (iv) the subject matter of the communication; and (v) any document generated in connection with the communication.

- (c) With respect to a person and to the extent the following information is not readily apparent: (i) the person's full name; (ii) the person's employer, job title, and a description of the person's current duties and those duties at the time of deletion or destruction; and (iii) the person's business address.

5. "You" and "your" refers to Harold J. Matz, as indicated by the context of the question.

6. The terms "related to," "relating to" or "in relation to" mean being in any way relevant to, commenting on, consisting of, referring to, composing, comprising, discussing, evidencing, identifying, involving, reflecting, or underlying.

7. The terms "state," "describe" and "explain" call for answers independent from any documents that are required in response to these interrogatories. Such answers should be in a form (e.g., narrative, tabular) appropriate for a complete response to the interrogatory.

8. "USPS" or "Postal Service" refers to the United States Postal Service, including USPS Headquarters and any subordinate department, division, or office of the USPS, whether at the national, area, district or local

level. This definition includes the officers, directors, agents and employees of the United States Postal Service and its Board of Governors.

9. “Your testimony” refers to the Testimony of Harold J. Matz on Behalf of the Postal Regulatory Commission, filed with the Postal Regulatory Commission on April 22, 2012.

INTERROGATORIES

USPS/PRC-T2—1. At page ii, lines 6-8, your testimony refers to your involvement in AMP studies. Please identify each AMP study that you participated in, including the date of each study, and your role in each study.

USPS/PRC-T2—2. Please indicate whether any of the AMP studies identified in your response to interrogatory USPS/PRC-T2-1 were conducted in connection with a change in service standards, and if so, exactly what those service standard changes were and how they were evaluated in that study.

USPS/PRC-T2—3. At page 31, lines 11-12, your testimony states that “[m]aintenance skilled employees, for the most part, currently work an 8-hour shift on Tour 2.” Please explain your understanding of how many skilled maintenance employees are assigned to or actually work among Tours 1, 2, and 3.

USPS/PRC-T2—4. At page 32, lines 15-20, your testimony addresses the age of Postal Service mail processing equipment and presents an opinion regarding the impact on this equipment resulting from adoption of the changes proposed in PRC Docket No. N2012-1. Please explain your understanding, if any, regarding the specific types and sub-types of Postal Service mail processing equipment

that would continue to be used in operations after adoption of the changes proposed in PRC Docket No. N2012-1, as compared to the equipment that would no longer be used in mail processing operations.

USPS/PRC-T2—5. At page 32, lines 21-22, your testimony states that “[s]alvaging the spare parts from excess machines is both expensive and time consuming.” Please quantify the expense you understand is associated with “salvaging the spare parts from excess machines” while identifying those sources upon which you rely for both the estimate and your original statement.

USPS/PRC-T2—6. At page 32, lines 21-22, your testimony states that “[s]alvaging the spare parts from excess machines is both expensive and time consuming.” Please quantify the time you understand is associated with “salvaging the spare parts from excess machines” while identifying those sources upon which you rely for both the estimate and your original statement.