

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

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
NATIONAL POSTAL MAIL HANDLERS UNION WITNESS BROXTON  
(USPS/NPMHU-T7-1—4)  
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness Robert J. Broxton, Sr. (NPMHU-T-7).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 23, 2012

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR  
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**Instructions and Definitions**

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

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

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**Interrogatories and Requests for Production**

**USPS/NPMHU-T7-1:** On page 2, lines 3 through 8 of your testimony, you state:

Based on my review of the consolidations, and my knowledge of the facilities involved, I have particular concerns with three proposed consolidations in the New England area: 1) the consolidation of the Eastern Maine facility into the Southern Maine facility; 2) the consolidation of the White River Junction, Vermont facility into Burlington; and 3) the consolidation of the Central Massachusetts P&DC letter processing into Boston.

Please state your understanding of whether the Eastern Maine P&DC and the White River Junction P&DC consolidation proposals referenced in your statement have been announced as disapproved by the Postal Service since the filing of your testimony.

**USPS/NPMHU-T7-2:** On page 2, lines 9 through 10 of your testimony, you state that the “geography of Maine is the first and primary reason why the consolidation of Eastern Maine into Southern Maine is unsound.”

- a. Please describe, in detail, your experience, education, or training related to logistics management and the transportation of mail between Postal Service facilities (including, but not limited to, the costs and savings analyses of transporting mail).
- b. Please produce any documents or data (including, but not limited to, any geographical data) that you relied upon in support of your statement.

**USPS/NPMHU-T7-3:** On page 3, lines 15 through 17 of your testimony, you state that “[p]articularly given that the Middlesex letters—a large daily volume—will also be coming into Boston for processing, I am very concerned that the facility will not be able to efficiently handle the mail in a timely manner.”

- a. Please confirm whether this statement assumes operation in the current network with current service standards.
- b. If your statement does not assume the current network and current service standards, please identify the environment that you are describing in your statement?
- c. Please state in terms of a percentage of current Middlesex mail volume, a volume that you would characterize as "large."
- d. Please define “timely manner.”

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- e. Please produce any documents or data that you relied upon in support of your analysis of Boston P&DC's mail processing capacity and identify and explain the specific portions that support your concern about the timely processing of mail.

**USPS/NPMHU-T7-4:** On page 4, lines 14 through 15, you state that you “do not believe that the Postal Service’s public input process was adequate to fully explore the local impact of the proposed consolidations.”

- a. Please provide your understanding of the Postal Service's obligation to solicit and consider public input in relation to a mail processing plant consolidation, including, but not limited to, identification of any internal instructions that form the basis for your belief that the current process is not sufficient.
- b. In your view, is it possible for a public input process to comply with applicable internal instructions, but still be deemed as not sufficient by a concerned postal employee or member of the public?