

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

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Post Office Structure Plan

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Docket No. N2012-2

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS JEFFREY C. DAY  
(APWU/USPS-T1-1-11)  
(June 22, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Jeffrey C. Day (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term “all documents” means every document as above defined known to USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term “Postal Service” includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden.

For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination.

If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-1 On Page 11 of your testimony you explain that “[b]ased on community input and operational needs, POSTPlan could result in: (1) upgrade of the Post Office Level; (2) realignment of retail window service hours to actual workload; or (3) discontinuance study.”

- (a) Please define “operational needs” and specify the factors that are evaluated as part of the consideration of “operational needs.”
- (b) Provide copies of any written materials including but not limited to, documents, emails, presentations, instructions, meeting minutes or notes, internal correspondences, that provide guidance on how to evaluate the community input and operational needs of the Postal Service.
- (d) Please confirm that the decision to upgrade the Post Office Level is not affected by community input. If not confirmed, please explain fully.

APWU/USPS-T1-2 Of the facilities being evaluated by POSTPlan, how many do not have Point-Of-Sale data? Please provide a list of these facilities identified by finance lead number, finance number, unit finance name and unit name.

APWU/USPS-T1-3 On Page 15 of your testimony you state “[t]he Postal Service **generally** will not study for discontinuance candidate Post Offices as part of the POSTPlan unless the community has a strong preference for discontinuance ... .” [Emphasis added.]

- (a) Please identify the exceptions under which the Postal Service will study for discontinuance Post Offices where the community has not expressed a “strong preference” for discontinuance.

APWU/USPS-T1-4 Your testimony indicates that the type of community served by a Post Office is not considered in the POSTPlan analysis [Page 15-16]. Why has the Postal Service decided not to consider this information?

- (a) Do you believe there is no value to considering the type of community served by a Post Office?
- (b) Do you believe that all communities have the same need for postal services?
- (c) Do you believe that all types of communities have the same means to provide input to the Postal Service?

APWU/USP-T1-5 On page 18 of your testimony you state “[i]f a candidate Post Office is not continued with realigned window service hours, however, the Postal Service **will likely** study the facility for discontinuance ... .” [Emphasis added.] What will determine whether a discontinuance study will occur in this situation?

APWU/USPS-T1-6 For facilities that are currently being considered for discontinuance, will community input already received during the discontinuance process be considered during the POSTPlan analysis?

APWU/USPS-T1-7 What factors affect the “timeframe for implementation“ of retail window service hour changes?

APWU/USPS-T1-8 On page 24 of your testimony you explain that “CSDC has been modified to include a new customer survey with more questions that measure non-revenue transactions at Post Offices.” Please provide a copy of the new customer survey.

APWU/USPS-T1-9 How are the “driving distances between Post Offices being studied and an alternative access point or another Postal Service facility” calculated? [Page 24]

APWU/USPS-T1-10 Please provide a copy of the training materials for the discontinuance coordinators and the training materials/presentations to be used at the planned “national level training” referenced on page 24 of your testimony.

APWU/USPS-T1-11 With regard to community feedback

- (a) How is a “community” defined under POSTPlan?
- (b) How is community feedback obtained?
- (c) Who in the community is provided with notice and the opportunity to provide written feedback?
- (d) Who is provided with notice and the opportunity to attend a community meeting?
- (e) How will the notice of the community meeting be provided?
- (f) How much time is permitted for members of the community to provided written feedback?
- (g) What is the expected time between when the Postal Service receives written community input and when the community meeting is held?
- (h) Please identify by name and title the persons responsible for reviewing the community surveys.
- (i) Please provide all training materials and other documents, presentations, etc.. which provide guidance and/or instruction on how to review and evaluate these surveys.
- (j) How does the Postal Service intend to ensure that it receives feedback from vulnerable members of a community, particularly the elderly, who are unable to attend a community meeting?