

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

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**MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012**

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**Docket No. N2012-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS REBECCA ELMORE-YALCH  
(APWU/USPS-T11-1-16)  
(January 10, 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 Rebecca Elmore-Yalch (USPS-T-11). 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.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-T11-1 On page 6 of your testimony you indicate that one objective of the qualitative research was to “understand why consumers and businesses would respond as they do.” Was this objective achieved? If so, what was learned?

APWU/USPS-T11-2 Would you agree that focus groups cannot provide statistically valid estimates of changes in mail volume?

APWU/USPS-T11-3 What was the main purpose of the focus groups?

APWU/USPS-T11-4 How did the information obtained in the qualitative market research impact the current proposal to eliminate overnight delivery and close processing facilities?

- a) If this information did not inform the current proposal, what was the purpose of conducting this research with regard to this proposal and how has the Postal Service used the qualitative market research?

APWU/USPS-T11-5 Why was the CBCIS list from August 2009 used as the sampling frame for the National, Premier and Preferred Accounts?

APWU/USPS-T11-6 On page 25 of your testimony you state that you conducted interviews with respondents at 26 unique National Accounts, or approximately 11 percent of the total universe of National Accounts that the Postal Service had in August 2009.

- a) What percentage of the mail volume of all the National Account holders did these 26 companies represent?
- b) You seem to have tried to contact all the National Account holders that were not on your do-not-call list. What reasons did the others give you for not participating in the survey?
- c) Of what type of businesses are National Account holders representative? (by firm size, single or multi-establishment).
- d) Were the changes to the service standards explained to National Account holders using the statement in Appendix E at page 88? If not, what description of the service standard changes was provided to the National Account holders?
- e) The description on page 88 describes the change in service standards and describes mail delivery as though it would happen according to the optimum described.
  - i. What percentage of the time are current service standards achieved for the National Account holders?

- ii. Were National Account holders provided a description of the likely actual mail delivery profile their mail would be provided?
- f) Were National Account holders interviewed about their likely response to a combination of this change in service standards combined with a change to 5-day delivery?
- g) Were National Account holders provided with a list of mail processing facilities that are being examined for closure at the time of the interview?
- h) What information were National Account holders given about the status of the specific mail processing locations that each of them use?
- i) What percentage of National Account holders indicated they thought they could prepare and deliver mail to the Postal Service to meet the requirements for overnight local delivery?
- j) Were any of the National Account holders asked if they had been impacted by a mail processing facility closure between 2008 and the present? If so, what types of questions were they asked?
- k) You state that no weighting was required for the National Account holders. Did you assume that the percentage change in mail volume resulting from the change in service standards calculated for this subset of National Account holders was applicable to all the National Account holders?

APWU/USPS-T11-7 On page 27 of your testimony you state that you conducted interviews with respondents at 416 unique Premier Accounts, or approximately 1.7 percent of the total universe of Premier Accounts that the Postal Service had in August 2009.

- a) What percentage of the mail volume of all the Premier Account holders did these 416 respondents represent?
- b) Did you make an attempt to contact each of the Premier Account holders? If not, how was this subset of account holders selected?
- c) Of what type of businesses are Premier Account holders representative? (by firm size, single or multi establishment)
- d) Were the changes to the service standards explained to Premier Account holders using the statement in Appendix E at page 88? If not, what description of the service standard changes was provided to the Premier Account holders?
- e) The description on page 88 describes the change in service standards and describes mail delivery as though it would happen according to the optimum described.
  - i. What percentage of the time are current service standards achieved for the Premier Account holders?
  - ii. Were Premier Account holders provided a description of the likely actual mail delivery profile their mail would be provided?
- f) Were Premier Account holders interviewed about their likely response to a combination of this change in service standards combined with a change to 5-day delivery?
- g) Were Premier Account holders provided with a list of mail processing facilities that are being examined for closure at the time of the interview?

- h) What information were Premier Account holders given about the status of the specific mail processing locations that each of them use?
- i) What percentage of Premier Account holders indicated they thought they could prepare and deliver mail to the Postal Service to meet the requirements for overnight local delivery?
- j) Were any of the Premier Account holders asked if they had been impacted by a mail processing facility closure since 2008? If so, what sort of questions were they asked.
- k) You state that no weighting was required for the Premier Account holders. Did you assume that the percentage change in mail volume resulting from the change in service standards calculated for this subset of Premier Account holders was applicable to all the Premier Account holders?

APWU/USPS-T11-8 On page 29 of your testimony you state that you used interviews with respondents at 414 unique Preferred Accounts, or approximately 0.1 percent of the total universe of Premier Accounts that the Postal Service had in August 2009.

- a) What percentage of the mail volume of all the Preferred Account holders did these 414 respondents represent?
- b) Of what type of businesses are the preferred accounts representative? (by firm size, single or multi-establishment)
- c) Please describe the sampling procedures that resulted in these accounts being selected.
- d) Were the changes to the service standards explained to Preferred Account holders using the statement in Appendix F at page 100? If not, what description of the service standard changes was provided to the Preferred Account holders?
- e) The description on page 100 describes the change in service standards and describes mail delivery as though it would happen according to the optimum described.
  - i. What percentage of the time are current service standards achieved for the Preferred Account holders?
  - ii. Were Preferred Account holders provided a description of the likely actual mail delivery profile their mail would be provided?
- f) Were Preferred Account holders interviewed about their likely response to a combination of this change in service standards combined with a change to 5-day delivery?
- g) Were Preferred Account holders provided with a list of mail processing facilities that are being examined for closure at the time of the interview?
- h) What information were Preferred Account holders given about the status of the specific mail processing locations that each of them use?
- i) What percentage of Preferred Account holders indicated they thought they could prepare and deliver mail to the Postal Service to meet the requirements for overnight local delivery?
- j) Were any of the Preferred Account holders asked if they had been impacted by the closure of a mail processing facility since 2008? If so, what questions were they asked?

- k) You state that no weighting was required for the Premier Account holders. Did you assume that the percentage change in mail volume resulting from the change in service standards calculated for this subset of Premier Account holders was applicable to all the Premier Account holders?

APWU/USPS-T11-9 You indicate on page 39 that supplemental interviews were conducted to add consumers in Hawaii and Alaska to your sample. Were those consumers asked exactly the same questions as the consumers in the main CARAVAN® sample?

APWU/USPS-T11-10 Was the description of service standard changes provided to consumers the description in Appendix F at page 142? If not, what description was used?

APWU/USPS-T11-11 Were consumers participating in the quantitative survey asked about their potential behavior if these changes in service standards were combined with the proposed changes necessary for 5-day delivery?

APWU/USPS-T11-12 What information, if any, were the participants in the quantitative survey provided about the rates of the postal products affected by the proposed service standard changes?

APWU/USPS-T11-13 Were consumers participating in the quantitative survey asked about their potential behavior if these changes in service standards were combined with an increase in postal rates?

APWU/USPS-T11-14 For Figures 34-39, are the percentages based on the percentage of respondents that chose each point on the likelihood scale or the percentage of mail volume corresponding to the respondents that had chosen the given level on the likelihood scale?

APWU/USPS-T11-15 On page 34 of your testimony you show the weights applied to small businesses. Were all the small businesses surveyed ones who had employees in addition to the owner?

APWU/USPS-T11-16 On page 31 of your testimony you indicate that screening questions were used to screen out companies that pay for postage via a postage meter, permit imprint, pre-cancelled stamps, or Express Mail corporate account.

- a) Of what subset of all businesses is this sample designed to be representative?
- b) How are businesses that are not account holders of the Postal Service (National, Premier or Preferred) but do use postage meters represented in your quantitative surveys?