

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO GREETING CARD ASSOCIATION WITNESS MORRISSEY
(USPS/GCA-T3-1 THROUGH 4)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Greeting Card Association, Inc. witness Raymond Morrissey: USPS/GCA-T3-1 through 4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
September 7, 2006

USPS/GCA-T3-1

Please provide copies of all correspondence, e-mails, documents and other communications sent by the Greeting Card Association, its members, affiliates and/or representatives, in 2005 and 2006, to the United States Postal Service relating to the design and/or operation of a test by the United States Postal Service of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. If there are any communications for which a duplicate hard copy does not currently exist and cannot be created, please provide a summary of the communication, the date on which it was transmitted, and identify by name and title the senders and recipients.

USPS/GCA-T3-2

Please provide copies of all correspondence, e-mails, documents and other communications created by the Greeting Card Association, its members, affiliates, and/or representatives, which discuss the results of any tests conducted by the United States Postal Service in either 2005 or 2006 of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. If there are any communications for which a duplicate hard copy does not currently exist and cannot be created, please provide a summary of the communication, the date on which it was transmitted, and identify by name and title the senders and recipients.

USPS/GCA/T3-3

Please provide copies of all correspondence, e-mails, documents or other communications received in 2005 or 2006 by the Greeting Card Association, its members, affiliates, and/or representatives from the United States Postal Service regarding the design, operation and/or results of any postal test of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. For any documents reflecting test results, please indicate as accurately as possible, the date on which such results were first received by GCA, its members, affiliates and/or representatives; and identify each recipient by name and title.

USPS/GCA-T3-4

- (a) Did any of the eight experiment participants listed in GCA-T-3 Appendix A observe the actual postal cancellation and/or processing of the square and rectangular cards utilized in the GCA Square Envelope Test?
- (b) If the response to subpart (a) is affirmative, please identify the operations they observed and summarize their observations.