

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF GENERAL COUNSEL

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
GREETING CARD ASSOCIATION WITNESS ERICKSON
(USPS/GCA-T1-1-15)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Erickson: USPS/OCA-T1-1-15.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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January 14, 1998

USPS/GCA-T1-1. Please identify the portion(s) of the Postal Reorganization Act pursuant to which the Commission can or should consider your testimony.

USPS/GCA-T1-2. Starting at page v of your testimony, you discuss a national telephone survey. Is this survey subject to the foundational requirements in the Rules of Practice, e.g., Rule 31(k)?

- a. If not, why not?
- b. If so, where is that foundational or other material? If it has not been filed, please provide it.

USPS/GCA-T1-3. At page v, you indicate that the focus of the survey was limited to greeting cards sent through the mail.

- a. Why was this limitation imposed?
- b. Of total greeting card volume, what portion goes through the mail?
- c. Is there any reason to believe that cards sent through the mail have materially different cultural value from those exchanged by other means? Please comment on the respective cultural similarities and differences between the two groups of cards.
- d. Are there any other means of exchanging messages that carry the cultural signals you identify with greeting cards? Please identify each and the extent to which each can serve as a substitute for greeting cards.

USPS/GCA-T1-4. Please provide copies of all documents provided to you or relied upon by you in developing your testimony beyond those cited in your testimony.

USPS/GCA-T1-5. On page 3 of your testimony, you introduce a paragraph with, "When a nation's mail system begins to be used for other than official or governmental messages," Do you believe that domestic mail service in the United States was ever intended primarily or exclusively for use with official or governmental messages? If so,

when did this change? If not, what is the significance of this statement?

USPS/GCA-T1-6. On page 7, line 6, you use the term “non-biological stuff”.

- a. Is this a term of art to anthropologists?
- b. Please define the term.

USPS/GCA-T1-7. Are you asserting in the discussion starting on page 10 that cultural value has no economic value? Why or why not? Please explain fully.

USPS/GCA-T1-8. Prior to the development of your testimony, had you done any work in your professional capacity that involved the greeting card industry? If so, please provide the dates and describe the substance of that work.

USPS/GCA-T1-9. Please identify the “researchers from Hallmark Cards, Inc.” (page 14, lines 17-18) by position, and describe their qualifications and respective roles.

USPS/GCA-T1-10. Please provide copies of all documentation furnished by or on behalf of Hallmark Cards, Inc. that in any way informed your research.

USPS/GCA-T1-11. Are any constituents of the mail stream in addition to greeting cards “part of American cultural rituals” (page 20 line 8)? If so, what are they? If not, why not? Please explain fully.

USPS/GCA-T1-12. In connection with the introduction to your national survey (pages 24-25), you indicate that you selected survey topics of inquiry that were “likely” affected by greeting cards.

- a. Of those that were selected, were they all seen as equally likely, or were some posited as more or less likely to be affected?
- b. What topics of inquiry were considered and rejected, and why?

USPS/GCA-T1-13. Please identify an authoritative citation for “theoretical sampling” (page 26, line 18) and briefly describe your understanding of its goals and methods.

USPS/GCA-T1-14. Why is an address on the outside of a greeting card (page 41, line 1) necessary to its cultural value?

USPS/GCA-T1-15. Please provide a copy of the contract with Elrick and Lavidge, Inc. pursuant to which the telephone survey was conducted, redacted as necessary to *protect any proprietary or commercially sensitive information.*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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