

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
ELMORE-YALCH TO INTERROGATORY OF  
DOUGLAS CARLSON  
DFC/USPS-T8-1  
(April 15, 2010)

The United States Postal Service hereby files the response of witness Elmore-Yalch to the following interrogatory of Douglas Carlson: DFC/USPS-T8-1, filed on April 1, 2010. A partial objection to this interrogatory was filed on April 12, 2010.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

R. Andrew German  
Managing Counsel, Pricing and  
Product Development

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product  
Support

Kenneth N. Hollies  
Michael T. Tidwell  
Attorneys

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ELMORE-YALCH  
TO INTERROGATORY OF DOUGLAS CARLSON

**DFC/USPS-T8-1.** Please provide all documents, notes, and other records relating to any customer's need for collection service on any day of the week that the Postal Service obtained, retained, or recorded during market research for the proposal pending before the Commission in this docket. This request specifically encompasses, and is not limited to, survey questions, responses to survey questions, comments of customers participating in focus groups, video and audio recordings in which customers participating in focus groups discussed collection service, and notes that Postal Service employees, contractors, or agents took of conversations during focus groups, surveys, or market research. For purposes of this interrogatory, the term "collection service" relates to and includes the terms blue collection boxes, post office lobby drops, post office retail window counters, leaving mail in an office, a home mail receptacle, or a cluster box for a letter or rural carrier to pick up, and mailing letters.

**RESPONSE:**

The Postal Service filed a partial objection to this interrogatory on the grounds of undue burden (thus limiting this response to the research described in my testimony), the lack of materiality (for other research I have conducted), the fact that it is duplicative (because it asks for materials such as questions and responses that have already been provided), and research confidentiality (revealing the identity of respondents or their firms).

However, the interest in determining what respondents said can be satisfied by reviewing the transcripts that will soon be filed . I am advised that transcripts of the focus groups and in depth interviews will be filed in two forms. The non-public version (USPS-LR-N2010-1/NP3) will contain complete transcripts while the public version (USPS-LR-N2010-1/12) redacts discussion of competitive products and perhaps some details that would identify respondents.

Certain other materials have also been identified as responsive to this interrogatory and will be provided; these include some notes made by witness Whiteman, text he prepared for presentation to the Postal Service's Executive Committee, and the final report on the qualitative research that Opinion Research Corporation prepared for its client, the United States Postal Service. Matters such as survey questions and responses are in my testimony and the cited library reference USPS-LR-N2010-1/NP2. See *also*, USPS-T-8 at 30, n.1.