

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

**Six-Day to Five-Day Street Delivery
And Related Service Changes, 2010**

Docket No. N2010-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS REBECCA ELMORE-YALCH
(APWU/USPS-T8-1-3)
(April 26, 2010)**

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-8). 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 Joseph Corbett (APWU/USPS-T2-1-6), filed on April 23, 2010, and are hereby incorporated by reference.

Respectfully submitted,

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

APWU/USPS-T8-1 According to your testimony, the focus group studies ORC conducted took place in Chicago, IL; Seattle, WA; New York, NY; and Atlanta, GA. Please explain how these locations were selected. Why were no locations in less urban areas selected?

APWU/USPS-T8-2 In the chart on page 64 of Appendix B of your testimony titled "Atlanta Standard Mail" five boxes in the "Types of Business" column are highlighted. Please explain why these boxes are highlighted.

APWU/USPS-T8-3 On page 7 of your testimony you discuss a one page document provided to focus group participants for review and indicate that the document had been modified throughout the groups. You include a "final" version of this document in Appendix D of your testimony. Please provide all other versions of this document used in the focus groups and specify which focus group used each version.