

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Six-Day to Five-Day Street Delivery :
and Related Service Changes : Docket No. N2010-1

GREETING CARD ASSOCIATION INTERROGATORIES
TO POSTAL SERVICE WITNESS ELMORE-YALCH
(GCA/USPS-T8-1 to T8-9)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents, specifically:

GCA/USPS-T8-1 to T8-9, to witness Elmore-Yalch

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, charts, tabulations, and workpapers. "Documents" includes written or printed records and disks, tapes, or other recorded media (together with such written matter as is necessary to understand and use such disks, tapes, or other media).

April 27, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T8-1.

- a. Please refer to pages 76 and 81 of your prefiled testimony. Please confirm that the eighteen focus group discussions of USPS' "Current Situation" included a question (to small business and consumer respondents, respectively) asking what would be the best ways for the Postal Service to address its deficit if the respondent were the CEO of USPS.
- b. Please confirm that in each case the next question asked the focus group: (1) what changes to address the deficit would you as a business (or consumer) be willing to accept; (2) would you prefer service changes or a 10% across the board rate increase.
- c. Please confirm that the set of questions immediately following those referenced in (a.) and (b.) above referred to the change to five-day service, and ended with a scale asking whether the respondent(s) preferred such a change in delivery or a 10% across the board rate increase (i.e. one or the other, not both).
- d. Please provide each small business or consumer CEO respondent's answers individually to questions a., b. 1. and 2. and c. above.

GCA/USPS-T8-2.

Please refer to your prefiled testimony at page 8. You there state that participants were asked to show and explain their preference for either reduction to five delivery days or a ten-percent rate increase, and reproduce the scale on which

participants were asked to record their responses.

a. Please explain why and how ten percent was chosen as the magnitude of the postulated rate increase, and furnish all documents describing, commenting on, or analyzing that choice.

b. The scale provided to participants for recording their views frames the question as “If these were the only two options to reduce the deficit the USPS is facing which would you choose?” Please explain fully the reasons for presenting participants with only these two options, and furnish all documents describing, commenting on, or analyzing the decision to do so.

GCA/USPS-T8-3.

Please refer to Appendix C, Part 2 of your prefiled testimony, and specifically to pages 81-82 (“Current Situation”), and to Appendix D, Part 3.

a. What indication (apart from the hypothesized ten-percent across-the-board increase, presented as part of the scale referred to in GCA/USPS-T8-1) was given to participants that the Postal Service has legal authority to increase its revenues by raising rates?

b. What, if any, indication was given to participants that recovery from the current economic recession could result in recovering some mail volume?

c. What, if any, indication was given to participants that the Postal Service has excess capacity in mail processing and other upstream functions?

d. Please furnish all documents describing, commenting on, or analyzing the matters covered by parts (a) – (c) above.

GCA/USPS-T8-4.

On page 11 of your testimony, you state: “As with the focus groups, an interview guide was developed to direct the flow of the conversation. A copy of the interview guide is included as Appendix E.”

- a. Please confirm that the *quantitative* part of your survey, which is included as Appendix E did not ask the respondent, whether large, medium, or small business, or the consumer if it would prefer five-day delivery to a rate increase.
- b. Please confirm that the *quantitative* part of your survey, which is included as Appendix E did not ask the respondent, whether large, medium, or small business, or the consumer what changes they would suggest or support to address the USPS deficit.

GCA/USPS-T8-5.

- a. Please confirm that the in-depth-interviews (IDI) that you conducted solely with national or premier accounts as part of your *qualitative* survey (Appendix D) did *not* ask the respondent if it would prefer five-day delivery to a rate increase.
- b. Please confirm that the in-depth-interviews (IDI) that you conducted as part of your *qualitative* survey did not ask the respondent what changes it would suggest or support to address the USPS deficit.

GCA/USPS-T8-6. Please confirm that your quantitative survey in Appendix E only asked questions pertaining to how the respondent would react to five-day delivery, Monday – Friday, and not whether the respondent supported five-day delivery or five-day delivery compared to an alternative.

GCA/USPS-T8-7.

- a. Were the questions and materials in Appendix C developed before those in Appendices D and E?
- b. Were the results from any of the focus groups used or considered in any way before the questions and materials in Appendices D and E were initiated, completed, or changed? If your answer is not an unqualified “no”, please explain fully.

GCA/USPS-T8-8. Did any of the individuals or organizations participating in the IDI or the focus groups, also participate in the telephone survey described in Appendix E? For each such entity, please provide their answers to GCA/USPS-T8-1-a. through d., and/or their answers to the in depth interview, followed by their answers to the questions in Appendix E.

GCA/USPS-T8-9.

Please refer to Appendix F of your prefiled testimony, headed “Consumer Questionnaire.”

- a. Please explain why, in item Q1 (pages 169-170), consumers were asked for

piece volume sent in amounts up to the billions.

b. Please explain why, in item Q2k (page 171), consumers were asked about their use of Regular and Nonprofit Standard Mail.

c. Please explain why, in the same item (page 172), consumers were asked about their use of Regular and Nonprofit Periodicals mail.

d. Please refer to Appendix F at page 179. Please explain why consumers were informed to the Postal Service's plans with respect to bulk mail entry units, Detached Mail Units, and the drop-shipment of destinating entry bulk mail at plants.

e. Please refer to Q11 and Q12 (page 184). Please explain why questions addressed to consumers referred to "your firm."