

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 CORBETT
(GCA/USPS-T2-1 to T2-2)

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-T2-1 to T2-2, to witness Corbett.

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).

May 3, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T2-1

Please refer to your prefiled testimony at page 4, lines 5-9, where you list four causes of the Postal Service's present financial situation.

(a) Please provide your estimate of the relative contribution of the "ongoing effects of the economic recession" to (i) the FY 2009 decline in mail volume cited on page 3, lines 11-12, and (ii) associated declines in revenue.

(b) Please furnish all documents on which your estimates rely.

GCA/USPS-T2-2

Please refer to your prefiled testimony at page 8, lines 9 to 16, and page 9, line 11, to page 10, line 11.

(a) Please furnish all studies, reports, or other documents consulted or relied on by you, which discuss, analyze, or offer proposals regarding –

(i) The onset and/or the duration of Internet substitution as a significant influence on First-Class Mail volume;

(ii) The basis for the belief that the recession may have accelerated diversion of First-Class Mail to the Internet; and

(iii) The basis for the belief that loss of First-Class Mail volume to the Internet is permanent.

(b) Please state your understanding of when the Postal Service concluded that loss of First-Class Mail volume to the Internet is permanent.