

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 INTERROGATORIES OF
AMERICAN POSTAL WORKERS UNION, AFL-CIO
APWU/USPS-T8-1-3
(May 10, 2010)

The United States Postal Service hereby files the responses of witness Elmore-Yalch to the following interrogatories of the American Postal Workers Union, AFL-CIO: APWU/USPS-T8-1-3, filed on April 26, 2010.

Each 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

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OF 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?

RESPONSE:

The objective in recruiting consumers and small businesses for the five-day delivery focus groups was to enable discussion among a cross section of respective consumer and small business customer segments.

For consumer groups we used three selection criteria: income, locale (city, suburban or rural), and CEO of the Mail (see USPS-T-8, p. 4). We also used three criteria for selecting small business customers: fewer than 100 employees; use of shipping services (Standard Mail or First-Class Mail); and responsibility for that business' mailing and shipping services. See USPS-T-8, p. 5.

We selected locations from different regions so as to have a reasonable geographic distribution: New York City in the northeast, Atlanta in the south/southeast, Chicago in the Midwest and Seattle in the west. In New York, groups were held in Manhattan as well as in suburban Westchester County. Therefore, in this market we were able to reach both inner city and suburban participants. In Atlanta, one group represented low-income center city residents. Then because the facility location was outside the central business district, we were able to recruit from the more rural areas surrounding Atlanta. In Seattle, two groups were held in downtown Seattle and the balance were held at a facility in East King County, where we were able to recruit one group of suburban

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residents and another representing residents of the rural regions north and east
of Seattle.

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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.

RESPONSE:

There are no particular reasons why these cells are highlighted. These sheets were used during the recruiting process when these cells are sometimes highlighted to facilitate procedural discussion.

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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.

RESPONSE:

Two versions of this document were used. The first was created on September 1, 2009 and used in two business groups in Chicago. The second was updated and used in the remaining groups held in Seattle, New York, and Atlanta. The updates were made to simplify the information being presented and were based on comments provided in these initial groups. Copies are attached below in chronological order.

USPS Saturday Service Concept

- Delivery of First- Class Mail, direct mail, magazines, newspapers, Priority Mail, and packages to street addresses or businesses will be Monday – Friday only.
- There will be **no** delivery to street addresses or businesses on Saturday.
- Mail will continue to be delivered to PO Boxes Monday – Saturday.
- There will be no mail collected from street addresses, businesses, collection boxes, or Post Offices on Saturday.
- Post Offices will remain open on Saturday as they are today to accept mail. However, mail accepted at a post office on Saturday will not be processed until Monday.
- All mail dropped off in a collection box after the last scheduled pickup on Friday will be collected and processed on Monday.
- Mail dropped off at a Post Office or in a collection box before the last Friday scheduled pickup time will be collected and processed on Friday and will be delivered the following week to street addresses and businesses. The day of delivery will depend on the class of mail used.
- There will be no pickup of Express or Priority Mail on Saturday. However, Express Mail will continue to be collected from Post Offices on Saturday – i.e., it must be dropped off at a Post Office.
- Express Mail will continue to be delivered 7 days a week..

USPS Saturday Service Concept

- No Saturday delivery of mail to homes and businesses. Delivery of mail will be Monday – Friday only.
- Mail will continue to be delivered to PO Boxes Monday – Saturday.
- Post Offices currently open on Saturday will remain open.
- No mail collected from street addresses, businesses, collection boxes, or Post Offices on Saturday. Mail dropped off at a Post Office or in a collection box after the last Friday scheduled pickup time will be collected and processed on Monday.``
- Elimination of Saturday collection, processing and delivery will generally add a day to the delivery of mail that is currently collected and processed or scheduled to be delivered on Saturday.
- Express Mail will continue to be delivered 7 days a week. Express Mail will continue to be accepted and processed on Saturday at Post Offices. However, there will be no pickup of Express or Priority Mail on Saturday.