

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 GRANHOLM  
(GCA/USPS-T3-1 to T3-8)

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-T3-1 to T3-8, to witness Granholm.

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 13, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T3-1

On page 13, lines 2-3 of your testimony, you refer to “other employees who fill in on the sixth day...”.

- a. Please state (i) the categories into which such employees fall and (ii) whether they are full time or part time employees, using the categories in Postal Service witness Colvin’s Attachment 1, page 2.
- b. Please confirm that all employees covered by (a) are city carrier employees. If you do not confirm, please state what craft(s) these employees belong to.
- c. What are the current numbers of all such “other employees” and their numbers of hours in FY 2009, (i) for Monday through Saturday delivery operations and (ii) for Saturday only?

GCA/USPS-T3-2

You note starting at page 9, line 22, of your testimony that “In the case of the National Rural Letter Carrier Association (NRLCA) National Agreement, there are requirements to adhere to when there is a change in the number of delivery days. Additionally, time elements in the Rural evaluated compensation system must be discussed and re-evaluated for negotiation.”

- a. Please provide a copy of the NRLCA National Agreement
- b. Please identify all provisions of the NRLCA National Agreement which you consider to be “requirements to adhere to when there is a change in the number of delivery days.”

c. Please identify all provisions of the NRLCA National Agreement which you consider to be “time elements in the Rural evaluated compensation system [which] must be discussed and re-evaluated for negotiation.”

d. Please provide all documents which you consulted or relied on in arriving at your understanding of the NRLCA National Agreement.

e. Please state your understanding of the processes involved in (i) adhering to the requirements concerning a change in the number of delivery days, and (ii) discussing and re-evaluating time elements in the Rural evaluated compensation system.

#### GCA/USPS-T3-3

On page 12, lines 19-20, of your testimony you note that “Carrier Technician assignments will no longer be necessary.” Please confirm that this would be true whether Saturday or some other delivery day were chosen to be eliminated. If you do not confirm, please explain fully why the quoted statement would not be true regardless of the delivery day eliminated.

#### GCA/USPS-T3-4

On page 12, lines 20-22, you state that with the elimination of Saturday delivery, existing Carrier Technicians will fill assignments that “become vacant through attrition and the elimination of Transitional Employees.”

- a. Please state, by fiscal year, the number of Transitional Employees and hours worked that are assumed reduced through elimination in the five-day delivery proposal.
- b. Please state the wage rates and total compensation of such Transitional Employees.
- c. Please state, by fiscal year, what attrition assumption you are making with regard to the departure of full time regular or part time career carriers whose positions current Carrier Technicians would be moved in-to with the elimination of Saturday delivery.
- d. Under your description of effect on the city delivery component, please (i) confirm that you have assumed that all or most all Carrier Technicians will become full time regular employees of the Postal Service, and (ii) please state the wage rate decrement each receives with this transition. If you do not confirm with respect to (i), please explain fully.
- e. Where a Carrier Technician becomes a regular career carrier by replacing a Transitional Employee, please confirm that this costs USPS more money, not less, ceteris paribus, since regular carrier earnings exceed those of Transitional Employees. If you do not confirm, please explain fully.

GCA/USPS-T3-5

Referring to your testimony, Postal Service witness Bradley states on page 19, lines 11-13, of his testimony that: "Operations experts, however, anticipate the hours savings will be for full time carriers so the appropriate wage for valuing saved hours is the full time regular wage."

a. Where in your testimony do you state that the hours saved from eliminating Saturday delivery will be for full time carriers, as opposed to part time regular or Transitional Employees?

b. What are the wage rate differences, respectively, (i) between full time regular carriers and part time regular, (ii) between full time regular and Transitional Employees, and (iii) between full time regular and the “other employees” you refer to on page 13, line 2 of your testimony?

#### GCA/USPS-T3-6

Please refer to page 14, lines 19-23, of your prefiled testimony. Please describe fully the circumstances under which you anticipate that retail hours on days other than Saturday might not be sufficient to handle increased retail lobby traffic.

#### GCA/USPS-T3-7

In your testimony at page 13, line 1, you state that USPS witness Bradley “will use the full time regular wage for City carriers” as the basis for estimating savings from ending Saturday delivery.

a. Please confirm that this implies an assumption that all or most of the work-hours saved from ending Saturday delivery will be from full time regular City carriers. If you confirm, please explain fully why this assumption is considered appropriate. If you do not confirm, please explain your answer fully.

b. The April 2010 GAO report on the Postal Service’s financial viability (GAO-10-455) states on page 16 that: “Current collective bargaining agreements ... contain ‘no lay-off’ provisions for about 500,000 employees and require USPS

to release lower-cost part-time and temporary employees before it can layoff any full-time workers without layoff protection.”

Please confirm that this contradicts use of the full time regular wage for City carriers as the basis for calculating savings from ending Saturday delivery. If you do not confirm, please explain fully.

GCA/USPS-T3-8

In your testimony at page 12, line 21, you refer to vacancies through “attrition” that current Carrier Technicians would fill.

- a. Please confirm that you referring to attrition of full time regular city carriers. If you do not confirm, please explain fully as to what labor complement you are referring in the use of the term “attrition”.
- b. Is your attrition assumption based on (i) the number of employees eligible for retirement, or (ii) a forecast of how many, among those eligible to retire, will actually retire, or (iii) some other figure? ? Please explain fully.
- c. Contractually, are those carriers eligible to retire free to continue working if they choose to?
- d. (i) In arriving at your judgment(s) regarding attrition referred to in (a) and (b) above, what data or analyses did you consult or rely upon? Please furnish copies of all such data or analyses.  
  
(ii) In arriving at your judgment(s) regarding attrition, what if any consideration did you give to (A) the state of the economy in recent years,

with particular regard to the number of jobs available, (B) the availability of jobs comparable to Postal Service carrier jobs with respect to compensation, benefits, and security, or (C) current financial uncertainties for retirees. Please provide any data or analyses you consulted or relied on in connection with any consideration you gave to these matters.

e. Is it your opinion that those carriers eligible to retire will in fact retire in the numbers they might were these economic conditions not present? Please explain fully the bases for your opinion.