

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 WHITEMAN
(GCA/USPS-T9-1 to T9-8)

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-T9-1 to T9-8, to witness Whiteman.

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 19, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. 1B
Arlington, VA 22206-1450
(703) 998-2568
(703) 998-2987 fax
E-mail: postamp@crosslink.net
GCA/USPS-T9-1

GCA/USPS-T9-1

Please provide a copy of the contract(s) USPS entered into with Opinion Research Corporation (ORC) regarding the proposed six-day to five-day reduction in delivery service. You may redact financial aspects of the contract(s) in your production of the requested document.

GCA/USPS-T9-2

Please provide copies of all other communications and documentation between yourself or those acting for you and Opinion Research Corporation that relate to what USPS asked ORC to do in this survey.

GCA/USPS-T9-3

Please provide copies of all communications including, but not limited to, e-mail correspondence between yourself and ORC after the contract was signed. Please include with this response logs of telephone calls and personal meetings with ORC and notes taken therein, including dates.

GCA/USPS-T9-4

Please provide copies of all data and other information, not provided in response to GCA/USPS-T9-3, considered by you in forming your expert opinion presented in USPS-T9.

GCA/USPS-T9-5

- a. Did you or anyone acting for you ask ORC to conduct any tests of the focus survey instrument or interview questionnaires before conducting its surveys of businesses and consumers?
- b. Did ORC conduct any tests of the focus survey instrument or interview questionnaires before conducting its surveys of businesses and consumers?
- c. If your answer to (b) is not an unqualified “no,” please provide copies of any such test results.
- d. If your answer to (b) is not an unqualified “no,” please provide changes to the instrument or questionnaires that resulted from the tests.
- e. If your answer to (a.) is not an unqualified “yes,” please explain the reasons for it.

GCA/USPS-T9-6

In the course of preparing the focus group materials, did you, or anyone else to your knowledge, advise ORC that the Postal Service’s plan was to seek *both* a rate increase this year via an exigent rate case as well as a change from six- to five-day delivery, and not one change *or* the other? If not, why not?

GCA/USPS-T9-7

On page 7 of USPS witness Elmore-Yalch's testimony, she states questions for ORC's focus groups were based in part on "a working document that was developed by Postal Service staff".

(a) Were you, or any person in your organizational unit, part of the Postal Service staff to which witness Elmore-Yalch refers?

(b) If your answer to (a) is not an unqualified "no," please (i) identify the individuals involved in developing the working document, and (ii) describe fully their contribution to the working document.

(b) Please provide a copy of the working document to which witness Elmore-Yalch refers.

GCA/USPS-T9-8

Please refer to the discussion, in Appendix B of your prefiled testimony, of non-employee businesses (page 4, second paragraph, through page 5, last full paragraph), where you state, inter alia, that owners of businesses with no employees are treated as consumers for purposes of your testimony.

(a) Please confirm that "owners," as used in footnote 8 on page 4 of your Appendix B, includes both owners of "occasional businesses, which may or may not get external recognition as businesses" and owners of non-employee businesses not falling under the description just quoted. If you do not confirm, please explain fully the meaning of "owners" as used in this footnote.

(b) Please confirm that the count of “businesses with no employees” referred to in the last full paragraph on page 5 of your Appendix B includes both (i) home-based businesses and (ii) businesses conducted in premises outside the home. If you do not confirm, please describe fully the scope of the term “businesses with no employees.”

(c) In the paragraph cited in (b) you state that the adjustment for non-employee businesses assumes “that mailing patterns for owners of such businesses resemble those of consumers.”

(i) Considering only home-based businesses, is it your judgment that the mailing pattern of the owner of such a business would resemble that of a consumer? Please explain fully the grounds for your answer.

(ii) Please explain fully what variables (e.g., total volume sent and received, volume sent and received by day of the week, postal products used) are included in the term “mailing pattern” as used in the paragraph cited in (b).

(d) In the design of any part of the survey research, was consideration given to the number of home-based businesses in the United States? If your answer is not an unqualified “no,” please provide all documents consulted or relied on in the course of any such consideration.