

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 GROSSMAN
(GCA/USPS-T5-1 to -T5-5)

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-T5-1 to -T5-5, to witness Grossman.

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 28, 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-T5-1

Please define the term “cluster” as used at page 4, line 23, to page 5, line 3, and on pages 9-10, of your prefiled testimony.

GCA/USPS-T5-2

Please refer to page 6, lines 1-11 of your prefiled testimony.

(a) With respect to Postal Service air transportation contractors who are also carriers on their own account (e.g., FedEx), please explain your understanding as to whether, and to what extent, these carriers process volumes of their own on Saturday and/or Sunday, for subsequent transportation on their own aircraft.

Please provide any documents you consulted or relied on in arriving at this understanding.

(b) Please explain your understanding of any effects on the capacity available to the Postal Service on Tuesdays on aircraft of the carriers referred to in (a), as a result of the five-day delivery service change. Please provide any documents you consulted or relied on in arriving at this understanding.

(c) Did the estimation process described at page 6, lines 1-11, take account of any changes in mail mix, as among classes transported by air, caused by the five-day delivery service change? If your answer is not an unqualified “no,” please explain fully how such changes were taken into account.

GCA/USPS-T5-3

Please refer to the discussion of Vehicle Service Drivers in your prefiled testimony, beginning at page 7, line 15.

(a) Does the Vehicle Service Driver craft include any (i) part time regular, (ii) flexible, or (iii) Transitional employees?

(b) If your answer to (a) is not an unqualified “no,” please explain fully (i) whether and to what extent the elimination of Saturday delivery would lead to replacement of employees falling into one category (part time regular, flexible, etc.) by employees falling into a different category, and (ii) the effect of any such replacement on the personnel costs of Vehicle Service following the elimination of Saturday delivery.

(c) If you are required to provide answers to (b), please also provide all documents you consulted or relied on in arriving at your answers.

GCA/USPS-T5-4

(a) Please state your understanding as to whether contracts for highway, air, or box route transportation have to be renegotiated if Saturday delivery is eliminated.

(b) If your answer to (a) is not an unqualified “no,” please (i) specify which types of contracts would be so affected, and (ii) describe the likely reasons for and results of such renegotiations.

(a) Please describe fully the process(es) by which you arrived at the following estimates presented in your prefiled testimony:

(i) Inter-area Highway transportation (elimination of 20 percent on Saturdays and 80 percent on Sundays; page 9, lines 10-15);

(ii) Inter-Cluster and Inter-P&DC Highway transportation (elimination of 30 percent on Saturdays and 80 percent on Sundays; page 9, lines 21-23);

(iii) Inter-BMC Highway transportation (no change; page 10, lines 10-13);

(iv) Intra-BMC Highway transportation (elimination of 40 percent on Saturdays and 50 percent on Sundays; page 10, lines 20-23);

(v) Intra-CSD Highway transportation (elimination of 100 percent of box route delivery on Saturdays, and of 60 percent of combination route transportation on Saturdays and 80 percent on Sundays; page 11, as corrected, lines 8-15); and

(vi) Intra-P&DC Highway transportation (elimination of 60 percent on Saturdays and 80 percent on Sundays; page 12, as corrected, lines 3-6).

(b) Please provide all documents you consulted or relied on in arriving at the estimates specified in (a).