

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

**Six to Five Day Street Delivery)
And Related Service Changes)**

Docket No. N2010-1

**NATIONAL NEWSPAPER ASSOCIATION
SECOND SET OF INTERROGATORIES TO POSTAL SERVICE WITNESS CORBETT
NNA/USPS T2-12 to T2-13
(June 7, 2010)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, National Newspaper Association (NNA) submits interrogatories and requests for documents to United States Postal Service Witness Corbett. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form. NNA respectfully requests that if the witness cannot respond to any interrogatory, the Postal Service will refer the question to a competent witness or provide an institutional response.

Respectfully submitted,

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NNA/USPS T2-12

Please review the testimony of Rebecca Elmore-Yalch where the description of information provided to focus groups is discussed on p. 9.

- a. Confirm that USPS management pay has been capped and describe the method of “capping.”
- b. Does the “capping” include a limitation on benefits? If so, please describe the limitation
- c. What percentage of USPS total payroll is affected by the “capping?”
- d. How many years has the “capping” been in effect?
- e. If “capped” does not mean “frozen,” in the sense that no increases have been given in either compensation or benefits, has the Postal Service instituted a “freeze” in the past three years for any category of management? If so, please describe it. If not, please explain why not.

NNA/USPS T2-13

For the fiscal years 2006, 2007, 2008 and 2009 respectively,

- a. please provide the percentage of increase in benefits and compensation required by the contracts for the four largest USPS employees' organizations
- b. please state for each year the total cost added to Postal Service expenses as a result of these increases