

**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  
INTERROGATORIES TO POSTAL SERVICE WITNESS PULCRANO  
(NNA/USPS T1-1 TO T1-11)  
(June 8, 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 Samuel Pulcrano. 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 T1-1**

Please describe the inefficiencies and associated costs for Postal Service operations if start-stop were to occur on a Tuesday or Wednesday, rather than a Saturday.

**NNA/USPS T1-2**

Did the Postal Service investigate dropping a delivery day other than Saturday during your management of the Five-Day team that you described and, if so, at what point during your investigation did you determine that Saturday was the Postal Service's choice?

**NNA/USPS T1-3**

Do you believe the Postal Service workforce overall prefers dropping Saturdays to dropping any other day if 5 day mail service were implemented?

**NNA/USPS T1-4**

Did the Five-Day Team consider asking mail recipients to choose the best day for non-delivery from within the range of weekdays and weekend days when it crafted questions for the various market surveys or did it always assume that tests would be conducted only for elimination of Saturdays?

**NNA/USPS T1-5**

If a complement of businesses had demonstrated a preference for dropping Mondays or Tuesdays instead of Saturdays, would the Postal Service have instead tested a weekday elimination in its marketing surveys and operational models?

**NNA/USPS T1-6**

After Saturdays, please confirm that Tuesday is the lightest mail volume day and state how volumes differ, both in numbers and in mailmix, between the two days. If you do not confirm, please describe the next lightest volume day.

**NNA/USPS T1-7**

Please confirm that Postmaster General John E Potter testified this year before the House Subcommittee on the Federal Workforce, Postal Service and the District of Columbia that the Postal Service had no business solution to offer newspaper publishers who need Saturday mail delivery and state whether you agree with that statement.

## **NNA/USPS T1-8**

If you agree with the statement attributed to the Postmaster General in T1-7, please describe how the Five-Day Team addressed the following:

- a. Whether the so-called ECSI values in 39 USC 3622(c)(11) would be served by non-delivery of newspapers;
- b. Whether the appearance of Periodicals mail as “under water” in the sense of not covering incremental costs affected the Team’s approach to the business needs of newspaper publishers;
- c. Whether the Team believed at the time of deliberation that most publishers affected by Saturday delivery elimination would be capable of moving Saturday issues to another delivery day;
- d. Whether the Team considered potential advertising competition from privately delivered newspapers if USPS relinquished the “iconic” 6 day delivery, and if so, how that consideration factored into its decision;

## **NNA/USPS T1-9**

Do you consider the Postal Service with its present mail mix to be an advertising medium?

## **NNA/USPS T1-10**

Did the Team assign any of its analysts or market researchers to examine whether rural America would be disparately impacted by the elimination of Saturday mail; if not, why not; and if so, please state whether any measurements or tests of rural business customers’ reactions were taken . If you respond in the affirmative, please provide the results of any measurements or tests.

## **NNA/USPS T1-11**

Did the Team believe that the Postal Service would hear from business mailers that more extensive cost-cutting should be considered in lieu of service cuts?

If your response is in the affirmative, please explain whether that is why the survey materials provided by witness Elmore-Yalch offered only 5 day delivery and a 10 percent rate increase in a dichotomy of choices. If not, please explain why respondents to surveys and participants in interviews were not offered an opportunity to select greater cost-management in lieu of the other options.