

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

SIX-DAY TO FIVE-DAY CARRIER DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS  
WHITEMAN TO INTERROGATORIES OF  
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO  
NALCA/USPS-T9-1-2  
(June 8, 2010)

The United States Postal Service hereby files the responses of witness  
Whiteman to the following interrogatories of National Association of Letter Carriers, AFL-  
CIO: NALC/USPS-T9-1-2, filed on May 25, 2010.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

R. Andrew German  
Managing Counsel, Pricing and  
Product Development

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

Kenneth N. Hollies  
Michael T. Tidwell  
Attorneys

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS WHITEMAN TO INTERROGATORY OF  
NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO

**NALC/USPS-T9-1.** On page 2 of your testimony, you estimate a loss of 1.238 billion pieces of mail from the elimination of Saturday delivery. Is that estimate based entirely on the research of Opinion Research Corporation described in USPS-T-8?

**RESPONSE:**

The process by which I developed the volume and related revenue estimates reflecting the implementation of five-day delivery is described in detail in Appendix B of my testimony.

The quantitative research conducted by Opinion Research was used to estimate the volume change by postal product for four customer segments which would occur with implementation of five-day delivery.

We applied the estimated volume change by postal product and the four customer segments to internal postal volume data thereby calculating the estimated volume change by postal product.

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**NALC/USPST9-2.** Has USPS ever on any occasions prior to 2009 conducted, or sponsored the conduct of, the type of qualitative and quantitative research described in your testimony and the testimony of Rebecca Elmore-Yalch (USPS-T-8) concerning the elimination of Saturday delivery? If so, state who conducted the research, when it was conducted and provide the results.

**RESPONSE:**

Based on my knowledge, understanding and experience, the Postal Service has conducted related research on three previous occasions that assessed the impact of implementing five-day delivery.

The first study was done in the early to mid 1980's. I have no details regarding who conducted the research or its results.

The second study was conducted in 1995 by Opinion Research Corporation and consisted of quantitative research involving households. We were not able to find any copies of reports; however, we were able to locate a brief summary of the research, a copy of which is being made available in LR-N2010-1/16, Market Research Materials Responsive to NALC Interrogatories.

The third study was conducted in 2001 by Opinion Research Corporation and included both qualitative and quantitative research with both consumers and commercial organizations. Copies of various documents that I was able to locate from this research are also included in LR-N2010-1/16.