

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 COLVIN
(GCA/USPS-T7-1 to T7-5)

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-T7-1 to T7-5, to witness Colvin.

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).

June 9, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T7-1.

- a. How much of the \$3.1 billion net savings from five-day delivery is total labor costs, and how much of that is wages?
- b. What is the qualitative and quantitative difference between “productive hourly rates” in Attachment 1 and (i) actual wage rates and (ii) actual total compensation rates?
- c. In terms of carrier savings from eliminating Saturday delivery, please show the amount of savings (hours saved and compensation foregone) for each employee type, using the same employee categories as found in Attachment 1, page 2, of your testimony.
- d. For each employee type, using the same employee categories as found in Attachment 1, page 2, of your testimony, please state the FY 2009 hourly wage rate for each, and total compensation for each.

GCA/USPS-T7-2.

- a. Which employee category in Attachment 1, page 2 represents a “Carrier Technician”, as the term is used by USPS witness Granholm on page 12, line 14 of his testimony, USPS-T-3? If this employee category is not listed in Attachment 1 page 2, why not?
- b. Which employee category in Attachment 1 page 2 represents a “Rural relief employee”, as the term is used by USPS witness Granholm on page 13 of his testimony, USPS-T-3? If this employee category is not listed in Attachment 1 page 2, why not?

- c. If your employee categories in Attachment 1, page 2 do not include the employee types noted in a. or b. above, please provide the same information for those employee categories as you do for those categories listed on page 2, as well as the information requested above in GCA/USPS-T7-1, part b.

GCA/USPS-T7-3.

You state on page 5 of your testimony that the amount of “facility space . . . needed for five-day delivery will be the same as under six days of delivery.” (Lines 8-10). And, on page 6, lines 11-13, you state “Administrative clerk savings have been identified in the operational analyses, without the use of piggyback factors, for plant processing and vehicle service drivers.” Finally, on page 13, you note that USPS witness Neri states there will be no outgoing sorting or plant cancellation of mail on Saturdays

- a. Please confirm that, even apart from the five-day delivery proposal, there is substantial excess capacity in USPS “facility space” for plant processing (see, e.g., USPS OIG Report January 7, 2010).
- b. If mail processing clerk savings can be realized via service cuts to the public such as five-day delivery, could such savings also be effected through closing and consolidation of P & DC plants? Please explain your answer fully.
- c. Supposing that all piggybacks associated with mail processing clerk savings were applied, how would the savings compare relative to the calculations you have made without piggybacks?

GCA/USPS-T7-4.

Suppose that instead of reduction of service to five-day delivery, network consolidation without service cuts was made instead. Recognizing that consolidating or closing mail processing plants would also entail a reduction in clerk and supervisory labor costs, what percentage and numerical reduction in existing P&DCs, the 21 re-named BMCs, and other facilities would be required to effect annual savings of \$3.1 billion?

GCA/USPS-T7-5.

On page 17, lines 3-8, of your testimony you note that “higher hourly labor costs” as well as other “somewhat offsetting factors” will impact “actual savings” from five-day delivery.

- a. What percentage increase in labor costs from labor negotiations this year and next year would it take to fully offset FY2012 savings from five-day delivery?
- b. What percentage drop in mail volume in FY2011 and 2012 would it take to fully offset FY2012 savings from five-day delivery?
- c. How many more delivery points would it take in FY2011 and FY2012 to fully offset FY2012 savings from five-day delivery?