

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
ELMORE-YALCH TO INTERROGATORY OF  
GREETING CARD ASSOCIATION,  
GCA/USPS-T8-10  
(June 18, 2010)

The United States Postal Service hereby files the response of witness Elmore-Yalch to the following interrogatory of Greeting Card Association, GCA/USPS-T8-10, filed on May 19, 2010.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS ELMORE-YALCH TO INTERROGATORY OF  
GREETING CARD ASSOCIATION

**GCA/USPS-T8-10**

Please refer to the first paragraph on page 26 of your prefiled testimony, where you state that qualified respondents to the consumer questionnaire “were asked to identify the applications used for personal purposes over the past 12 months.”

(a) Was the intent of the quoted inquiry to have the respondent exclude from his or her responses to all items in the questionnaire any information regarding use of an application for purposes of a home-based business (as distinguished from “personal” purposes)?

(b) If your answer to (a) is not an unqualified “yes,” please explain the intended meaning of “personal purposes” in the quoted passage.

**RESPONSE:**

Yes. The consumer questionnaire was intended to include volume estimates only for the personal household mail.

Respondents were initially screened to ensure that they were the individuals in their households with primary responsibility for handling the receipt, sorting, and other management of household mail. Qualified respondents were then asked to identify the applications used for personal purposes over the past 12 months.

Following are the questions from the questionnaire:

S1 Are you the person in your household that is primarily responsible for handling the receipt, sorting and other tasks related to your household’s mail?

S4 Which of the following types of mail and/or packages have you sent for personal purposes in the **Past 12 Months**?

As noted on page 30 of my testimony, data from two respondents were dropped because they reported sending more than 500 pieces of mail or packages in the past 12 months. This volume is atypical for a consumer and suggests that the respondent may be operating a business at home.