

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 THE UNITED STATES POSTAL SERVICE  
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORY  
REDIRECTED FROM WITNESS PULCRANO  
(NNA/USPS-T1-8(a))

The United States Postal Service hereby provides an institutional response to the above-listed interrogatory of the National Newspaper Association dated June 8, 2010. Subpart (a) of the interrogatory has been redirected from witness Pulcrano to the Postal Service for an institutional response. The interrogatory is stated verbatim and followed by the response. The remaining subparts (b) through (d) will be answered by witness Pulcrano.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
June 28, 2010

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION  
REDIRECTED FROM WITNESS PULCRANO**

**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.

**RESPONSE**

Interrogatory NNA/USPS-T1-7 reflects a characterization of a statement attributed to the Postmaster General that would be consistent with the service changes under review in this docket.

- a. Newspapers tendered to the Postal Service for delivery will continue to be delivered when the planned service changes are implemented. Under the five-day operations plan, newspapers and other mail addressed to Post Office boxes will be delivered Monday through Saturday; newspapers and other mail addressed to street addresses will be delivered Monday through Friday. The Postal Service agrees that different types ofailable matter, including newspapers, can contain varying degrees of educational, scientific, cultural and informational content. The Postal Service considers that the intrinsic educational, cultural, scientific and informational value of matter is not determined by whether it is sent once a day, once a week, only on weekdays, only on weekends, or whether it is mailed at all.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE NATIONAL NEWSPAPER ASSOCIATION  
REDIRECTED FROM WITNESS PULCRANO**

**RESPONSE to NNA/USPS-T1-8 (continued)**

The Postal Service delivers mail, including newspapers, at various prices and in classifications that are required to be based upon consideration of a host of factors in section 3622(c). ECSI criteria in subsection 3622(c)(11) are among many that may be considered in establishing and revising rates and classes for market dominant products. ECSI values are relevant to classification and pricing. However, once mail is classified and priced, content-related ECSI considerations do not elevate classical music compact discs (Media Mail) or newspapers (Periodicals) or library books (Library Mail), for example, to such a status that they are entitled to preference in dispatch and handling over Priority Mail or First-Class Mail, for example. In an instance where a newspaper (or compact disc or library book) is not delivered at all after tender to the Postal Service or some other delivery provider, as the question seems to pre-suppose, the Postal Service concedes that its educational, scientific, cultural and informational content would not have been transmitted to its intended recipient.

(b-d) [Responses provided by witness Pulcrano]