

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 FOLLOWUP INTERROGATORIES
TO POSTAL SERVICE WITNESS ELMORE-YALCH
(GCA/USPS-T8-11 to -T8-13)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits followup interrogatories and requests for production of documents, specifically:

GCA/USPS-T8-11 to -T8-13, to witness Elmore-Yalch.

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 30, 2010

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. 1B
Arlington, VA 22206-1450
(703) 998-2568
(703) 998-2987 fax
E-mail: postamp@crosslink.net

GCA/USPS-T8-11

Please refer to your response to GCA/USPS-T8-2(a), where you state that the 10 percent rate increase used in your survey is based on “my understanding ... that it loosely approximates the value that five-day delivery means to the Postal Service.

(a) Did you, any other ORC staff, or anyone from the Postal Service, share that understanding with participants in any part of your survey work?

(b) From whom did you get your understanding of the approximate relationship referred to above, and when?

GCA/USPS-T8-12

Please refer to your responses (i) to GCA/USPS-T8-2(b), where you state, regarding an alternative to 5 day delivery: “A rate increase was chosen because it was something participants could easily relate to[,]” and (ii) to GCA/USPS-T8-3(c), where you state that “I did not find any specific instance where participants were told that the Postal Service has excess capacity in mail processing and other upstream functions.”

(a) Would you expect businesses in a recession or a declining industry to “easily relate to” the notion that cutting excess capacity would be an alternative to cutting Saturday delivery as a way of cutting costs? Please fully explain any negative response.

(b) Did any participants in your focus groups suggest cutting excess capacity (or, more generally, the size of the Postal Service)?

GCA/USPS-T8-13

Please refer to your response to GCA/USPS-T8-4 and -T8-5, where you confirm that no participant in the quantitative survey or the qualitative IDI interviews was asked whether it would prefer five-day delivery to a rate increase, and no participant was asked what changes they would suggest to address the USPS deficit.

(a) Please explain fully why these participants were not asked these questions in either the IDI or quantitative survey.

(b) Please provide your best opinion as to whether it would be reasonable to assume that premier and national accounts and other mailers familiar with the USPS would especially have useful suggestions on these matters?