

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 GRANHOLM
(GCA/USPS-T3-9 to -T3-14)

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-T3-9 to -T3-14.

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

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GCA/USPS-T3-9

Please refer to your response to GCA/USPS-T3-1(c).

(a) Please clarify what the first three numbers labeled “current numbers” refer to (i.e., 833, 19,850, and 14,136).

(b) Please confirm that the second set of six numbers refer to FY 2009 hours for Monday through Saturday (column (i)) and Saturday only (column (ii)). If you do not confirm, please explain fully.

GCA/USPS-T3-10

In his response to GCA/USPS-T6-11(c), Postal Service witness Bradley says he has no knowledge of your experience negotiating postal labor contracts. The question was not redirected to you or USPS institutionally for a response. Please respond to GCA/USPS-T6-11(c).

GCA/USPS-T3-11

In your response to GCA/USPS-T3-4, you state for answers a. and c. that no such input was necessary for your analysis and that “I made none”. However, USPS witness Bradley states on page 19, lines 11-12, that “Operations experts, however, anticipate the hours savings will be for full time carriers....”

(a) Are you one of the operations experts USPS witness Bradley is referring to, or are such experts reporting to you?

(b) Given certain labor contracts and considerable precedent in the history of collective bargaining within the Postal Service to preserve and protect the

jobs of full time regular employees, please explain fully how you are able to “anticipate” that the hours savings will be for full time carriers rather than, for example, for transitional employees?

(c) Without knowing the expected amount of attrition, how do you know that there is enough attrition for M- F full time regular carriers to absorb much or most Carrier Technicians displaced from five-day delivery, as you state you expect in your testimony at page 12, lines 19-22?

(d) Please explain fully how, without *both* an attrition assumption and the number of transitional employees, you can assume that the labor saved from five-day delivery can all be valued at a full time regular wage for City carriers, as opposed to a mixture of that wage rate and the much lower rate for transitional employees?

(e) (i) Is a surrogate for d. above your “proportions of Saturday carrier hours,” referenced on page 12, line 23 of your testimony?

(ii) Please provide a numerical value for such “proportions” and the raw data upon which the proportions were estimated.

GCA/USPS-T3-12

Please refer to your response to GCA/USPS-T3-5.

(a) Please reconcile all your answers with the substantially different answers in Postal Service witness Colvin’s testimony at Attachment 1, page 2, productive hourly rates, and his response to GCA/USPS-T7-1.d.; and

(b) Please identify the source of your wage information in your original response with more specificity than the term “from Finance,” and provide that source.

GCA/USPS-T3-13

Please refer to your response to GCA/USPS-T3-6. Based on your answer, what input did you convey to USPS cost witness Bradley about the possible need for extra hours to accommodate customers at retail facilities?

GCA/USPS-T3-14

(a) In your response to GCA/USPS-T3-7, please explain fully how you can “assume” for any purpose, including your input to witness Bradley, that “full-up” savings, i.e. savings based on full time regular carrier compensation rates, provide an accurate measure of cost savings from five-day delivery when it appears from the GAO finding that much or most of the savings would come from much lower cost transitional employees.

(b) Apart from the question of the merit of your wage rate assumption inputted to witness Bradley as it relates to likely operational outcomes for five-day delivery, would you agree that if much or most of the savings from 5-day delivery was from transitional employees, the (net) savings estimate from five-day delivery would be lower than \$3.1 billion?

(c) Please provide a complete definition of the term “full-up” as you have used it in responding to GCA/USPS-T3-7.