

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 WHITEMAN
(GCA/USPS-T9-9 to -T9-12)

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-T9-9 to -T9-12, to witness Whiteman.

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-T9-9

Please refer to your response to GCA/USPS-T9-6, where you state: “I was aware of discussion that a price increase was possible but was not involved in the planning or execution.”

- a. Did you or anyone else working on the five-day case at the Postal Service tell witness Elmore-Yalch that the 10 percent rate increase alternative to five day delivery had the same or approximately the same value to the Postal Service; i.e. about \$3.5 billion (before offsetting volume losses)?
- b. To your knowledge was any participant in the survey told the information in part a.?
- c. To the best of your knowledge was any participant in the survey told, or would they reasonably have had knowledge of, the fact that the value of a 10% rate increase was likely more than double that of five day delivery in terms of cutting USPS deficits?

GCA/USPS-T9-10

Please refer to your answer to GCA/USPS-T9-8(a), where you stated that the survey did not explicitly consider home based businesses because they “do not tend to have much mail volume” and are therefore “comparable to consumers.”

- a. Apart from any view the Postal Service may hold that small volume users are unimportant to it, please confirm that the impact of ending Saturday service on home based businesses, which could affect a family’s or individual’s livelihood, is quite different from its impact on a consumer. If you do not confirm, please explain fully.

- b. Please confirm that the purpose of the survey to evaluate how *participants* would react to five-day delivery, rather than to ascertain which groups are important or unimportant to USPS based on their volume usage of postal services. If you do not confirm, please explain fully.

GCA/USPS-T9-11

GCA/USPS-T6-4 was directed to USPS witness Bradley, and in his response he said that the subject matter (volume estimation) fell within your purview rather than his. The whole interrogatory reads:

GCA/USPS-T6-4.

On page 5, lines 6-7 of your testimony, you state that your methodology “recognizes that movement to five-day delivery is an operational change, not a volume change.”

- a. In arriving at your methodology, did you examine evidence from other national posts that have reduced delivery days as to whether mail volume was affected?
- b. If not, why not? If so, please provide a copy of all such information you consulted or relied upon in preparing your testimony.

Please answer GCA/USPS-T6-4 as though it had been directed to you originally.

GCA/USPS-T9-12

Please refer to your June 22, 2010, responses to NNA/USPS-T9-2 and -T9-3.

(a) In designing your test of how “customers would react to the implementation of five-day delivery as an alternative to a significant price increase[,]” was consideration given to providing the customers with a hypothetical price increase

equal or approximately equal, in terms of financial benefit to the Postal Service, to the projected benefit from five-day delivery?

(b) If your answer to (a) is not an unqualified “no,” please describe fully the consideration which was given to such a hypothetical price increase, including the reason(s) for rejecting it.