

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 COLVIN
(GCA/USPS-T7-6 and -T7-7)

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-T7-6 and -T7-7, to witness Colvin.

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-T7-6

Please refer to your response to GCA/USPS-T7-3(b), where you state that closing or consolidating P & DC plants might entail “operative constraints” and “service cuts to the public.”

a. Please explain fully the meaning of “operative constraints” as used in this statement.

b. Please confirm that there have been several recommendations and/or plans to cut processing capacity since the President’s Commission recommended this in 2005.

c. Please confirm that five-day delivery and material reductions in retail post offices, as well as other deficit reduction and cost cutting initiatives, also entail service cuts to the public.

GCA/USPS-T7-7

In response to GCA/USPS-T7-4, you state that a “commensurate amount of time and effort” would be needed to cut mail processing capacity in P&DC’s.

a. Please state (i) the total expense to date and (ii) estimated overall total that USPS has spent and will spend on the N2010-1 case.

b. Please provide all information available to you concerning the total cost USPS has spent on AMP’s in the most recent fiscal year; or, if such information is unavailable, your best estimate of such total cost in the most recent fiscal year.