

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

REVISED RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
ELMORE-YALCH TO INTERROGATORIES OF
NATIONAL NEWSPAPER ASSOCIATION,
NNA/USPS-T8-8-9
[ERRATA]
(July 16, 2010)

The United States Postal Service hereby gives notice of the filing of witness Elmore-Yalch's revised responses to the following interrogatories of National Newspaper Association, NNA/USPS-T8-8-9, responses to which were originally filed on July 13, 2010. That day an erratum was filed to conform the date on the cover sheet to the day of filing. This pleading effectuates the re-filing of these responses so that each begins on a separate page. The content of the responses does not otherwise change.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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OF NATIONAL NEWSPAPER ASSOCIATION

NNA/USPS T8-7

Please refer to the description of the Postal Service's financial situation, used for in depth business interviews, beginning on p 76.

- a. Why did the explanation of the Postal Service's situation exclude any mention of labor costs?
- b. Did respondents seem to be aware of any aspect of the Postal Service's labor costs, such as the percentage such costs contribute to overall costs, the manner in which compensation is set, the degree of control USPS has over layoffs or any other aspect of the USPS labor component?
- c. Did any respondent inquire about any of the elements in part b or [sic] this interrogatory? If so, please describe how the interviewer responded.

RESPONSE:

a) The explanation of the Postal Service's financial condition used in the qualitative research was developed to provide a general overview of the issues contributing to the Postal Service's financial situation and was not meant to be all inclusive. It was designed to be read by the moderators to initiate participant discussion of the situation to see what participants recommended / suggested in response.

b-c) Participants in some groups did discuss the Postal Service's labor costs. A review of the focus group transcripts at USPS-LR-N2010-1/12 can be used to identify specific participant comments on those elements outlined in response to part (b) of this interrogatory.

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NNA/USPS T8-8

Please refer to p. 80 of your testimony when consumer interviewees were asked to think about the mail they receive.

- a. Please explain why newspapers were not included in the list.
- b. Please confirm that by excluding newspapers, these interviews were unlikely to detect consumer reactions to receiving newspapers after expected delivery dates.
- c. If you assume that in a 5 day delivery scheme, local newspapers with a Saturday publication date would not reach recipients on Saturday unless through Express Mail or a PO Box, did any aspect of your research gauge consumer reaction to this change?

RESPONSE:

- a) The list included the primary types of mail that most Postal Service customers send and receive. The list was not meant to be inclusive of all types of mail Post Service customers send and receive. Unlike magazines, most individuals receive their newspapers through home delivery services, retail purchases, or other means. Therefore, magazines as an example were better suited to initiation of discussion the types of publications consumers and small businesses receive in the mail.
- b) Not confirmed. Nothing was specifically excluded from the discussion. Participants addressed other examples of items they send and receive through the mail than those included in the page 80 list. As time permitted, the moderator often closed this discussion by asking if there were other things that participants send and receive through the mail not already discussed.
- c) Respondents and participants had no difficulty understanding that delivery would not occur on Saturdays in a five-day delivery scenario except via Express Mail or a P.O. Box. In fact the document provided to all participants (Appendix D,

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Part 1, page 84) for review and subsequent discussion clearly stated this..

Therefore it can be reasonably assumed that qualitative research participants understood the potential impact of five-delivery on newspapers received by mail.