

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES, 2010

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Docket No. N2010-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO NATIONAL NEWSPAPER ASSOCIATION WITNESS AL CROSS  
(USPS/NNA-T2-1 THROUGH T2-13)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories and requests for the production of documents to National Newspaper Association witness Al Cross: (NNA-T-2): USPS/NNA-T2-1 through T2-13.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **USPS Interrogatories to NNA witness Cross**

### **USPS/NNA-T2-1.**

Please refer to page 4, lines 10-20 of your testimony and cite all provisions of the United States Constitution, all current Federal statutes, and all implementing regulations governing the operation of the United States Postal Service that equate “quality postal service” with “six-day delivery” and, taking holidays into account, require six-day delivery “no matter where people choose to live in this land of liberty.”

### **USPS/NNA-T2-2.**

Please refer to page 4, line 26 of your testimony.

- (a) List and explain all material differences between “rural” residents and “truly rural” residents.
- (b) List and explain all material differences between “suburban” residents and “truly suburban” residents.
- (c) List and explain all material differences between “urban” residents and “truly urban” residents.

### **USPS/NNA-T2-3.**

Please refer to page 4, lines 28-29 of your testimony and confirm that, even if the proposed service changes are implemented, the Postal Service:

- (a) intends to continue delivery of mail to Post Office Box addresses six days a week in rural areas as well as urban and suburban areas;
- (b) intends to generally eliminate delivery of mail to all street addresses, whether located in urban, suburban or rural areas.

If you do not confirm, please explain.

### **USPS/NNA-T2-4.**

Please refer to your testimony at page 6, lines 20-24. Please provide copies of or citations to all documents on which you relied in developing this portion of your testimony. Quantify the percentage of deliveries “often scheduled for Saturdays” and provide all documentation and cite all sources in support of that figure.

Please provide specific citations to documents regarding scheduled prescription shipments, focusing in particular on the arrangements through which refills are shipped, and the actions taken by shippers and recipients to schedule shipments to arrive in advance of the scheduled depletion of existing patient supplies.

### **USPS/NNA-T2-5.**

Please refer to your testimony at page 7, lines 16-18 and specifically cite the basis for your understanding that, if the proposed service changes are implemented, “small rural post offices . . . would not be open on Saturdays” -- for customers to enter packages in the mail, pick up held mail, or purchase money orders -- as a result of the elimination of rural carrier operations.

## **USPS Interrogatories to NNA witness Cross**

### **USPS/NNA-T2-6.**

Please refer to your testimony at page 9, lines 19-22.

- (a) For each local weekly newspaper identified in your testimony, please list the various means through which local residents interested in the local high school's sports teams currently can obtain scores and accounts of the team's games before such information is published in that newspaper.
- (b) For each local daily newspaper identified in your testimony, please list the various means through which local rural residents interested in the local high school's sports teams currently can obtain scores and accounts of the team's games before such information is published in that newspaper.

### **USPS/NNA-T2-7.**

Please refer to your testimony at page 10, lines 1-6.

- (a) For each local weekly newspaper identified in your testimony, please list the various means through which local residents can become informed regarding deaths, funerals and memorial services of local relatives, friends and neighbors before such information is published in that newspaper.
- (b) For each local daily newspaper identified in your testimony, please list the various means through which local residents can become informed regarding deaths, funerals and memorial services of local relatives, friends and neighbors before such information is published in that newspaper.
- (c) For each newspaper discussed above in response to subparts (a) and (b), please indicate the days of the week on which that newspaper is routinely entered in the mail stream.
- (d) For each newspaper discussed above in response to subpart (c), please identify which publications routinely shift a daily or weekly
  - (i) publication date; and/or
  - (ii) mail entry dateon account of such holidays as New Year's Day, July 4<sup>th</sup>, Thanksgiving or Christmas.

### **USPS/NNA-T2-8.**

At page 10, lines 11-13, your testimony identifies "competition from the Internet" as a source of lost print revenue for the newspaper industry. Please identify all other sources of competition that have contributed to the loss of print revenue for the industry. Describe all alternative sources of revenue (exclusive of newspaper printing and distribution) being pursued by each of the rural daily and weekly newspapers identified in your testimony.

## **USPS Interrogatories to NNA witness Cross**

### **USPS/NNA-T2-9.**

Please refer to your testimony at page 11, lines 1-3. Although it apparently is not part of a corporate chain and its executive operations are not in a headquarters remotely located from its production facility, is the *Cadillac News* an enterprise that is able to “tap into expertise” through its membership in a publishing trade association such as the NNA or the Michigan equivalent of the Oklahoma Press Association mentioned in the Table on page 11?

### **USPS/NNA-T2-10.**

Please refer to the third paragraph in Table on page 11 of your testimony and provide the information referenced there as the “list below”.

### **USPS/NNA-T2-11.**

For each rural daily or weekly newspaper identified in your testimony, please identify which ones on any occasion during FY 2006-10 have entered their publications in the mail stream on a particular day and on any such occasion:

- (a) requested same-day within-county postal delivery;
- (b) expected same-day within-county postal delivery; and
- (c) experienced same-day within-county postal delivery

of a substantial portion of copies for which such service was requested or expected.

### **USPS/NNA-T2-12.**

Please refer to your testimony at page 8, lines 8-10 and state whether it is your understanding that one of the modes of advertising to rural residents used by firms such as Wal-Mart is direct mail advertising. Please confirm that the successful use of direct mail advertising can contribute to a retailer “rarely” advertising in a local rural newspaper.

### **USPS/NNA-T2-13.**

Please refer to your testimony at page 8, lines 6-7 and state your understanding of whether national retailers also serve as “important civic actors” and provide “support for local causes and programs.”