

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

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

Docket No. N2010-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED BY THE UNITED STATES POSTAL SERVICE
TO NATIONAL NEWSPAPER ASSOCIATION WITNESS MAX HEATH
(USPS/NNA-T1-1 THROUGH T1-16)

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 Max Heath: (NNA-T-1): USPS/NNA-T1-1 through T1-16.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Michael T. Tidwell
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov

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USPS Interrogatories to NNA witness Heath

USPS/NNA-T1-1.

Please refer to page 5, line 27 of your testimony and provide citations to or copies of all documents related to the “promise” to newspaper publishers “from their federal government” regarding “6 day mail service”.

USPS/NNA-T1-2.

Please refer to page 6, line 28 of your testimony and confirm that the *Graham Leader*, the newspaper referenced on page 4 of your testimony:

- (a) maintains an Internet website (www.grahamleader.com) that publishes news articles and photographs related to local high school sports;
- (b) permits website visitors to transmit via e-mail to friends and family weblinks to copies of those local high school sports photos;
- (c) maintains a Facebook page to further bind its readers together.
- (d) Of NNA member newspapers that publish accounts of high school Friday night football games and the matters listed at the top of page 7 of your testimony, what percent currently do not publish Saturday editions? Provide data separately for (i) daily, (ii) weekly, and (iii) semi-weekly publications, as you define them, and explain each such definition.

USPS/NNA-T1-3.

For the last four home games of the Graham Steers varsity football team in 2009, please indicate:

- (a) the date and scheduled kick-off time;
- (b) the date and time of the posting of related post-game news and photographs on the *Graham Leader* website.

USPS/PR-T1-4.

Please refer to your testimony at page 9, lines 22-24 regarding the growth in Within County newspaper mail volume in FY 2008 and 2009. For each year (see page 82 at http://www.usps.com/financials/pdf/annual_report_2009.pdf), please calculate:

- (a) the percentage of total mail volume represented by Within County mail;
- (b) the percentage of total mail volume for each year represented by the growth in Within County mail volume.

USPS/NNA-T1-5.

Please refer to your testimony at page 12, line 1 and identify the “closing list” to which you refer.

USPS Interrogatories to NNA witness Heath

USPS/NNA-T1-6.

Please refer to your testimony at page 14, lines 22-23. There you state that “[i]n the communities I work with, most businesses have firm holdout or [Post office] box service anyway” Please identify the communities to which you refer and provide all information within your custody that would indicate whether the same is true for American businesses and communities generally.

USPS/NNA-T1-7.

Your testimony summarizes variations in the reactions of newspaper publishers to the proposed elimination of Saturday delivery to street addresses.

Assume, hypothetically, that for some rational reason consistent with discretion permitted by its operating charter, the Postal Service currently provided Monday-through-Saturday delivery to rural routes and Monday-through-Friday delivery to city routes each week (excluding the impact of holidays). Assume that, for some additional rational reason consistent with discretion permitted by its charter, the Postal Service decided to reduce rural delivery to Monday-through-Friday, on the same terms as city delivery, and with no corresponding price changes. Further assume that both rural and city newspaper publishers relied exclusively on the Postal Service for delivery. Assume also that, for perfectly rational business and service reasons, rural publishers preferred six-day delivery to five-day delivery. Finally, assume that when the service change is implemented, affected rural publishers continued to rely exclusively on postal delivery and responded by making operational and service changes.

Would you characterize these rural publishers as:

- choosing five-day delivery as a preferred option; or as
- reluctantly accepting five-day and trying to adjust to it?

Please explain your response.

USPS/NNA-T1-8.

Please refer to your testimony at page 14, lines 29 through page 15, line 3. Please cite to the specific pages of postal testimony in which “eliminating another week day [as an alternative to Saturday] is described as “unworkable”.

USPS/NNA-T1-9.

Please refer to page 15, lines 6-20 of your testimony. What rationale would you offer for the Postal Service to justify a policy determination of arranging Saturday delivery to street addresses exclusively for one market dominant product -- periodicals – and no others?

USPS Interrogatories to NNA witness Heath

USPS/NNA-T1-10.

Please refer to page 16, lines 8-10 of your testimony.

- (a) Confirm that the Postal Service's proposed service changes would not bar any postal patrons from receiving newspapers by mail. If you do not confirm, please explain.
- (b) Is it your testimony that, if the service changes at issue in this docket are implemented, mail recipients who receive free street address delivery five days a week will be completely incapable of understanding why mail recipients who pay for Post Office Box delivery receive six-day service, even if simple and clear explanations:
 - (i) are provided directly by the Postal Service; and
 - (ii) reported objectively by newspapers?

USPS/NNA-T1-11.

Please refer to your testimony at page 3, lines 13-15. Provide the dates of the briefing sessions to which you refer and the names of the postal executives who provided the briefings. Also identify which executives implied that "the end of Saturday delivery is "fore-ordained" and, in each case, list the "reasons" that each executive purportedly offered to support this conclusion.

USPS/NNA-T1-12.

Please state the daily/weekly within-county circulation figures for each of the newspapers identified on pages 4-5 of your testimony for which such figures are not provided in your testimony.

USPS/NNA-T1-13.

Refer to your testimony at page 7, lines 20-24.

- (a) Please confirm that rural Americans participate in the election of representatives to the United States House of Representatives and Senate.
- (b) Is it your understanding that no persons from rural America currently serve in the United States Congress?
- (c) In your study of the Tea Party movement participants and farmers who have driven their tractors to the nation's capitol in recent decades, are you aware of the airing of any grievances specifically associated with the Postal Service, or any particularly related to the issue of a reduction in regular mail delivery frequency? If so, please elaborate and provide documentation and citations.

USPS Interrogatories to NNA witness Heath

USPS/NNA-T1-14.

Please refer to your testimony at page 9, lines 17-19. Assume, hypothetically, that postal costs were in such a state that NNA and the Postal Service were in complete harmony that they were being “properly managed.” Would you then agree that the relative density of a newspaper on a postal delivery route could affect its “profitability” to the Postal Service in the same way (even if not to the same degree) that relative density affects the profitability of a newspaper-operated distribution route? If not, please explain.

USPS/NNA-T1-15.

Please refer to your testimony at page 13, lines 7-15. Please provide the dates and locations of all Mailers Technical Advisory Committee and Periodicals Operations Advisory Committee meetings attended by any representative or member of NNA at which any iteration of the service changes at issue in this docket were discussed by postal representatives between March 2009 and April 2010.

USPS/NNA-T2-16.

Please refer to your testimony at page 16, lines 2-5.

- (a) Please provide copies of all instructions that require the reporting of the discovery of mailbox bombs by newspaper delivery personnel to NNA.
- (b) By day of week, please indicate your understanding of the frequency of the placement of such bombs in mailboxes.
- (c) Since, as you assert, it has never been reported to NNA, please explain why the discovery of melted chocolate in a mailbox by a postal letter carrier on any day of the week would be expected to result in an incident report from that carrier being brought to the attention of NNA.
- (d) Also, please confirm that the upcoming Federal requirement mandating direct deposit of Social Security checks for new recipients effective March 2011 and current recipients on March 2013, will soon bring a merciful end to the use of the “melted chocolate on a Social Security check in a mailbox” scenario in testimony filed before the Postal Regulatory Commission. If you cannot confirm, please explain.