

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-T1-17 THROUGH T1-21)

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-T1-17 through T1-21.

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](mailto:michael.t.tidwell@usps.gov)

August 11, 2010

## **USPS Interrogatories to NNA witness Heath**

### **USPS/NNA-T1-17**

- (a) Please identify all representatives and members of NNA who were invited to attend and participate in online webinars in February and March 2010 in which the service changes under review in this docket were discussed by representatives of the USPS Five-Day team.
- (b) Please confirm that participants in the webinar were requested to and did ask questions and provide input about the five-day operational concept.

### **USPS/NNA-T1-18**

- (a) Please provide the number of NNA members who publish newspapers that are only delivered on Saturdays.
- (b) For each such newspaper, state whether the Postal Service and/or an alternative (non-postal) delivery service provider currently is used for delivery. If the Postal Service and an alternative service provider are used, please provide for calendar year 2009, the percentage of newspapers that were delivered on Saturday by the Postal Service and the percentage delivered by the alternative service provider.

### **USPS/NNA-T1-19**

Please refer to page 12, lines 13 -14 of your testimony where you state that readers of newspapers are accustomed to finding them in a receptacle. Is the receptacle to which you refer the reader's mailbox in every instance? If not, please explain.

### **USPS/NNA-T1-20**

- (a) Identify each NNA member that employs alternative (non-postal) service providers to deliver newspapers to street addresses?
- (b) For the most recent calendar or fiscal year, provide the average unit price they paid for such alternate delivery.
- (c) Do any such alternative delivery services deliver the newspaper by:
  - (i) Placing the newspaper in a receptacle not located on the same post or pillar that supports a mail box?
  - (ii) Placing the newspaper in a separate receptacle located on the same post or pillar that supports a mail box?
  - (iii) Dropping or throwing newspaper on the recipients' driveway or elsewhere on the recipient's property?
- (d) Where non-postal alternatives are available, please list and explain all reasons why NNA members prefer postal delivery?

### **USPS/NNA-T1-21**

Please refer to pages 5-7 of your testimony where you state that the elimination of Saturday postal street delivery will force publishers of small newspapers to seek delivery via alternative (non-postal) delivery services. On average, please provide the unit price that such newspapers expect to or anticipate having to pay for such delivery.