

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 DOCUMENTS
DIRECTED BY THE UNITED STATES POSTAL SERVICE TO
NATIONAL ASSOCIATION OF LETTER CARRIERS
WITNESS MICHAEL CREW
(USPS/NALC-T4-1 THROUGH T4-6)

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 Association of Letter Carriers witness Michael Crew: (NALC-T-4): USPS/PR-T4-1 through T4-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 11, 2010

USPS Interrogatories to NALC witness Crew

USPS/NALC-T4-1.

Please refer to the paragraph that begins at the bottom of page 1 of your testimony. Describe the teaching, writing, editing and consulting you have performed in the field of market survey research. Provide copies of all published works you have authored reflecting the execution or supervision of, or the analysis and review of market research, including quantitative and qualitative market research and opinion surveys.

USPS/NALC-T4-2.

Please refer to the bottom half of page 7 of your testimony.

- (a) Provide copies of all of the referenced “econometric studies . . . [that] assess demand elasticity in connection with contemplated service changes” that “other postal operators have used”.
- (b) Provide copies of all “calibrated simulation studies and sensitivity analyses on the consequences of demand resulting from changes in . . . delivery frequency” to which the studies referenced in subpart (a) have led.

USPS/NALC-T4-3.

Please refer to the first full paragraph on page 8 of your testimony. Would it be more accurate to describe the analysis in NALC-LR-N2010-1/12 as *assuming* a two percent across-the-board decline in mail volume (in the absence of any survey research or econometric analysis) rather than *predicting* such a decline? If your response is not wholly affirmative, please explain.

NALC/USPS-T4-4.

Please refer to the paragraph that begins on page 10 of your testimony.

- (a) Cite the “accepted principles of project management” to which you refer.
- (b) How far in advance of scheduled implementation do the “accepted principles of project management” require for the development of temporal implementation plans for service changes of the type under review in this docket?
- (c) Would you regard provision of a cross-functional “temporal template or plan for implementation” by the Postal Service to the Government Accountability Office over six months prior to implementation to satisfy accepted principles regarding timely submission of such templates/plans? If not, please explain.
- (d) Is it your testimony that the principles referenced in subpart (a) are violated by the fact that the Postal Service’s temporal implementation plans for all technical and personnel changes that will be made in support of the service changes under review in this docket (which are not likely to be implemented before July 2011) were not presented to the Postal Regulatory Commission by the time of the filing of your testimony in August 2010?

USPS Interrogatories to NALC witness Crew

NALC/USPS-T4-5.

- (a) Have you ever have conducted, directed or managed a quantitative market research study?
- (b) Have you ever used a quantitative market research survey or study in your studies of regulatory economics and the economics of postal services?
- (c) If the answer to either subpart (a) or (b) is affirmative to any degree, please provide a copy of any such study, a summary of the objective of the survey or study, a description of your role and involvement in its design and execution, and your use of its results.

NALC/USPS-T4-6

- (a) Have you ever have conducted, directed or managed a qualitative market research survey or study?
- (b) Have you ever used a qualitative market research survey or study in your studies regulatory economics and the economics of postal services?
- (c) If the answer to either subpart (a) or (b) is affirmative to any degree, please provide a copy of any such study, a summary of the objective of the survey or study, a description of your role and involvement in its design and execution, and your use of its results.