

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 RILEY
(USPS/NALC-T5-8 THROUGH T5-14)

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 Riley: (NALC-T-5): USPS/PR-T5-8 through T5-14.

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 NALC witness Riley

USPS/NALC-T5-8

Please refer to page 6 of your testimony, the last full paragraph, where you state that elimination of Saturday delivery “would also send a signal to customers that their needs and preferences no longer matter to the Postal Service.” Please provide copies of all data, analyses, market research studies and other documents, aside from any documents filed by the Postal Service in this docket, upon which this conclusion is based.

USPS/NALC-T5-9

Please refer to page 6 of your testimony, the last full paragraph, where you state that elimination of Saturday delivery:

would reinforce the negative stereotype of the Postal Service as an inefficient government entity rather than a vital service-orientated service. Such a negative stereotype would not only dampen the public’s demand for postal services but would erode its support for the Postal Service as an institution.

Please provide copies of all data, analyses, market research studies and other documents, aside from any documents filed by the Postal Service in this docket, upon which these statements are based.

USPS/NALC-T5-10

Have you conducted any research or analyses about the competitive advantage the Postal Service holds over its package delivery competitors that you refer to on the bottom of page 6 of your testimony? If your answer is affirmative, please provide copies of all such research or analyses.

USPS/NALC-T5-11.

Please refer to your testimony at page 7, section V, “The Postal Service Should Adopt a Consumer Oriented Strategy”.

- (a) What specific postal services and products should be made more accessible and attractive to customers? Please explain in detail any changes you believe should be made to existing services and products.
- (b) Have you performed any analysis of the amount of additional expense the Postal Service would incur and the additional revenue that would be generated if it did as you suggested? If so, please provide copies of all documents related to such analysis.

USPS/NALC-T5-12.

At the bottom of page 7 of your testimony, you assert:

We live in an era where service companies are *increasing* days and hours of operation to appeal to their customers.

Please specifically identify the service companies to which you refer, describe the products and services they offer, and specify the increases in days and hours of operations to which you refer.

USPS Interrogatories to NALC witness Riley

USPS/NALC-T5-13.

Please refer to page 8 of your testimony, where you discuss the reduction in USPS collection boxes. There, you assert that the Postal Service “eliminated 24,000 such ‘blue boxes’ in 2009 alone. Is it your testimony that the removal of 24,000 USPS collection boxes in FY 2009 resulted in the elimination of all such boxes at each of 24,000 different locations? If so, please explain.

USPS/NALC-T5-14.

At the top of page 5 of your testimony, you assert that:

As a rule of thumb during my time as CFO of the Postal Service, we assumed that a 10% price increase for market-dominated products (also known as “mailing services”) would yield a net revenue gain of about 9%, since it would reduce volume by about 2% and costs by about 1%.

- (a) Please identify which USPS omnibus rate requests during your tenure as CFO were governed by this rule and identify the postal testimony in each docket which reflected reliance on the quoted assumption.
- (b) Please describe the circumstances and purposes for which the rule was otherwise applied.