

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORIES TO
POSTAL SERVICE WITNESS ELMORE-YALCH

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatories to Postal Service witness Elmore-Yalch:

GCA/USPS-T11-T1 to -T6

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media).

December 23, 2011

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T11-1

Please explain fully, with references to the forms and guides used for your opinion research, whether, and if so, how, respondents and participants were made aware of (i) the potential reduction of delivery days from six to five per week, and (ii) the effect on speed of delivery of a possible combination of this reduction with the change in service standards at issue in this Docket.

GCA/USPS-T11-2

Please refer to your prefiled testimony at page 5, lines 17-18.

Does “holiday cards” refer to holiday cards sent by businesses to their customers, holiday cards sent by households, or both?

GCA/USPS-T11-3

Please refer to the description of Alaska and Hawaii interviews in your prefiled testimony at page 13, and in particular the observation concerning relative impact at lines 2-3.

Did the interviewees in this part of your research include any located within (i) the Intra-SCF Honolulu area (other than Guam), or (ii) ZIP codes 99501-99539 in Alaska?

GCA/USPS-T11-4

Please refer to Appendix C, Part 1 (Business Groups), of your prefiled testimony, at page 75, and to Appendix D, at page 81.

(a) Please explain fully why, in the Moderator's instructions (Appendix C, Part 1), at lines 6-19, the Moderator is directed to discuss "current," "outstanding," and "long" service standards, while at the cited page of Appendix D there is provision for participants to estimate times for "too long" standards as well as for the three just mentioned, and for estimating usage levels under "outstanding," "long," and "too long" scenarios.

(b) Please provide the same information with respect to the corresponding part of Appendix C, Part 2 (Consumer Groups).

GCA/USPS-T11-5

Please refer to section 6.4 of your prefiled testimony, beginning on page 44, and to Appendix F.

(a) At lines 16-17 of page 44 you refer to "the likelihood they [i.e., respondents] would change the way they send their mail." Please explain fully (i) what options were intended to fall under the concept "the way they send their mail," and (ii) how, if at all, this range of options was conveyed to respondents.

(b) At Appendix F, Part 1 (page 89) the interviewer is directed, as part of the introduction, to ask for an interviewee "who makes decisions and/or recommendations on how to send **the majority of** your organization's mail? [AS NEEDED: By how to send, I mean decisions or recommendations as to what Postal Service products to use to send your organization's mail".

(i) Does the sentence following "AS NEEDED" correspond in any way to the concept "the way they send their mail" referred to in (a)? Please explain fully either an affirmative or a negative answer.

(ii) Does that sentence exhaust the concept "the way they send their mail"? If your answer is not an unqualified "yes," does the concept "the way they send their mail" cover communication or shipping options not covered by the sentence following "AS NEEDED"? If so, please describe and explain them.

(iii) Please explain under what circumstances an interviewer was to decide that the sentence following "AS NEEDED" should be added to his/her introduction.

(c) At several places in Appendix F, the phrase "(AS NEEDED: using the U.S. Postal Service)" appears as part of a question (e.g., Q2A, p. 93). Is this phrase intended to convey all and only the same meaning as the "AS NEEDED" sentence referred to in (b), above? If your answer is not an unqualified "yes," please explain fully its intended meaning.

GCA/USPS-T11-6

Please refer to (i) the prefiled testimony of witness Whiteman, USPS-T12, at pages 18, line 6, to 19, line 6, and (ii) your own prefiled testimony, at section 6.4.1.

(a) Mr. Whiteman, discussing a "tendency for over-projecting results," states that a more detailed discussion of techniques for dealing with it appears at the cited section of your testimony. Please provide references to all discussions or descriptions of such a tendency or of techniques for dealing with it which ap-

pear in your prefiled testimony or the Library References associated with your testimony or Mr. Whiteman's.

(b) To the extent such information is not supplied in the references requested in (a), please describe fully (i) the reasons for believing that responses in this research were overstated, (ii) the techniques used to adjust or otherwise deal with such perceived overstatement, and (iii) the difference, in each case where such a technique was used, between the adjusted and unadjusted results.

(c) Please provide all documents setting forth, explaining, or evaluating the matters covered by (b).