

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 LACHANCE

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 LaChance:

GCA/USPS-T13-1 to -3

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-T13-1

Please describe fully the Postal Service's outreach to consumers, as distinguished from business mailers or other entities in the mailing industry, regarding the service standard changes at issue in this Docket since August 2011. If written materials or other documents were prepared and used in connection with such consumer outreach, please provide copies or, for Internet material, information as to where they may be accessed.

GCA/USPS-T13-2

Please refer to your prefiled testimony at page 5, line 7, through page 7, line 5.

(a) Please describe fully any initiatives directed at consumers and small businesses through the channels mentioned in this portion of your testimony which focused on the service standard changes at issue in this Docket, or any preliminary or developmental version of those changes. If written materials or other documents were prepared and used in connection with such initiatives, please provide copies or, for Internet material, information as to where they may be accessed.

(b) Please describe fully any initiatives of the type referred to in (a) which (i) preceded the development of the Mail Processing Network Rationalization plan and/or the associated service standard changes, or (ii) sought input from the consumers or small businesses addressed with respect to the development of such a plan and/or associated service standard changes. If written materials or other documents were prepared and used in connection with such initiatives, please provide copies or, for Internet material, information as to where they may be accessed.

GCA/USPS-T13-3

Please refer to your prefiled testimony at page 6, line 14-16.

Please identify by page and line numbers the portion(s) of Mr. Whiteman's testimony to which this statement refers.