

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS ELMORE-YALCH
TO NATIONAL POSTAL POLICY COUNCIL INTERROGATORY
NPPC/USPS-T12-11(b-c)**

The United States Postal Service hereby provides the response of witness Elmore-Yalch to the above-listed interrogatory parts of the National Postal Policy Council, dated January 31, 2012. The interrogatory part are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
ELMORE-YALCH TO NPPC INTERROGATORY,
REDIRECTED FROM WITNESS WHITEMAN

NPPC/USPS-T12-11. Please refer to your responses to NPPC/USPS-T12-5 and 6.

* * *

b. Did any of the four “Financial Services” organizations indicated in your response to NPPC/USPS-T12-5 provide responses regarding their use of the mail for Application “DD” – that is, “documents such as reports, contracts, policies, legal papers, etc.” as defined by witness Elmore-Yalch (USPS-T11 at 17)? If yes, please explain.

c. Were any of the four “Financial Services” organizations indicated in your response to NPPC/USPS-T12-5 insurance companies?

RESPONSE:

* * *

b. No, as indicated in the response to NPPC/USPS-T12-5.

c. Yes, two of the financial services organizations were insurance companies.