

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
SUSAN W. BERKELEY (USPS-T-39) TO INTERROGATORIES OF  
GROWING FAMILY, INC. (GF/USPS-T10-4 and 6),  
REDIRECTED FROM WITNESS LILLIAN WATERBURY (USPS-T-10)  
(July 14, 2006)

The United States Postal Service hereby provides the responses of witness Susan W. Berkeley (USPS-T-39) to the following interrogatories of Growing Family, Inc., filed on June 30, 2006, and redirected from witness Lillian Waterbury (USPS-T-10):

GF/USPS-T10-4 and 6

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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RESPONSE OF USPS WITNESS BERKELEY (USPS-T-39) TO  
INTERROGATORY OF GROWING FAMILY, INC.,  
REDIRECTED FROM WITNESS WATERBURY (USPS-T-10)

**GF/USPS-T10-4.** In response to GF/USPS-T10-1(e), you state that the COD indemnity payments for FY2003 amounted to \$1,477,000 and in FY2004 amounted to \$2,214,000. Please explain the reason(s) for this 50% increase in claims paid from FY2003 to FY2004.

**RESPONSE:**

I believe the reason for the increase in the COD indemnity payments from FY 2003 to FY 2004 can be attributed to the increase in the number of claims during that same period. In FY 2003 there were 12,041 claims filed and in FY 2004 there were 21,950 claims filed – an increase of over 82 percent.

RESPONSE OF USPS WITNESS BERKELEY (USPS-T-39) TO  
INTERROGATORY OF GROWING FAMILY, INC.,  
REDIRECTED FROM WITNESS WATERBURY (USPS-T-10)

**GF/USPS-T10-6.**

(a) Please confirm that in a March 10, 2006 letter to counsel for Growing Family, attached to Growing Family's Second Interrogatories to Postal Service Witness Berkeley, Delores Killelte, the Postal Service's Vice President and Consumer Advocate, stated that "[t]he delivery system established by the Postal Service provides scans to record events for COD deliveries, such as, Acceptance, Arrival at Unit, Notice Left, Refused, Unclaimed, and Delivered."

(b) Please explain why, in light of this system of scans to record these steps, it is not possible to segregate COD parcels delivered by city carriers from those delivered by rural carriers.

(c) Please explain why this system of scans does not permit the matching of COD claims with COD parcels.

**RESPONSE:**

(a) Confirmed.

(b) The scanning system does not differentiate between type of delivery employee.

(c) There is no scan for the event of a COD claim, although information from the scanning system can be used in claims adjudication.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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July 14, 2006  
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