

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO INTERROGATORIES OF
DOUGLAS F. CARLSON
(DFC/USPS-T7-15-17)

The United States Postal Service hereby provides responses of witness Needham to the following follow-up interrogatories of Douglas F. Carlson: DFC/USPS-T7-15-17, filed on September 3, 1996.

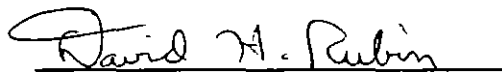
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

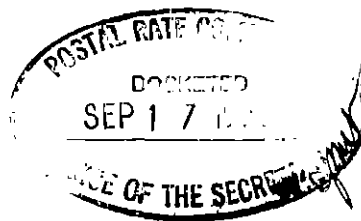
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
September 17, 1996



RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO FOLLOWUP INTERROGATORIES OF
DOUGLAS F. CARLSON

DFC/USPS-T7-15. On page 38, lines 2-4, you stated that many ATM customers will pay a transaction fee "if they use their ATM card at a bank other than their own bank or branch of their main bank."

Suppose that ATM X is owned and operated by a customer's bank but located at a branch of that bank other than the branch where this customer's account is located. Suppose that ATM Y is owned and operated by this customer's bank and is located at the branch where this customer's account is located.

a) Please cite an example of a bank that charges a higher fee to the customer in this example for conducting a particular transaction at ATM X than for conducting that transaction at ATM Y. If you cite an example, please file as a library reference a copy of the service-charge schedule from that bank that verifies this fee structure.

b) If you cannot cite an example in (a), would the testimony quoted above be more accurate if it were revised to read "if they use their ATM card at a bank other than their own bank"?

c) If your answer to (b) is no, please explain why the original language still would be accurate.

RESPONSE:

a) I have not conducted any research on the scenario you describe, and therefore do not know of an example.

b&c) Perhaps only for the scenario you describe. However, the testimony states "a fee" and not "a higher fee" and with respect to my response to DFC/USPS-T7-9(b), the original language is accurate.

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DFC/USPS-T7-16. Please confirm that a letter delivered to a post-office box in City X for a customer who lives in City Y does not involve the postal services of an agency other than the Postal Service at any time from the moment the letter is deposited with the Postal Service until the letter is delivered to the customer's post-office box.

RESPONSE:

Confirmed, assuming "for" in the second line of your question means "addressed to".

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WITNESS NEEDHAM TO FOLLOWUP INTERROGATORIES OF
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DFC/USPS-T7-17. Assuming a letter does not require forwarding by the Postal Service, please confirm that a letter that is successfully delivered to a post-office box in City X for a customer who lives in City Y is not also delivered in City Y by the Postal Service or transported by the Postal Service to City Y after delivery in City X.

RESPONSE:

Confirmed; however, this does not preclude delivery of letters to the customer's residence in City Y on the same day the letter is delivered to the customer's post office box.

DECLARATION

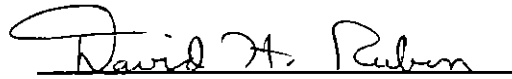
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: September 17, 1996

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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