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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DOUGLAS F. CARLSON
(USPS/DFC-1-9)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Douglas F. Carlson:
(USPS/DFC-1-9).

Respectfully submitted,

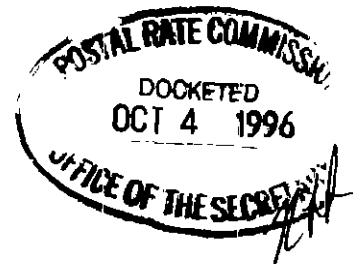
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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Washington, D.C. 20260-1137
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October 4, 1996



**INTERROGATORIES OF UNITED STATES POSTAL SERVICE
TO DOUGLAS F. CARLSON**

USPS/DFC-1. Please refer to your testimony at pages 2 and 3.

(a) Why did you obtain post office box service, rather than carrier delivery, in Walnut Creek?

(b) Why did you obtain post office box service, rather than carrier delivery, in Davis?

(c) Was the only reason you obtained a post office box in Emeryville to test the delivery service there? If not, please explain fully.

(d) Why did you obtain post office box service, rather than carrier delivery, in Berkeley?

(e) Have you obtained post office box service in any other post office? If so, please list each post office, and explain why you obtained post office box service.

(f) What size boxes have you used at each of the locations where you have used post office box service? If you have used other than size 1 boxes, please explain the circumstances that led to your use of larger boxes.

USPS/DFC-2. In any instance when you have used post office box service, was carrier delivery to your residence available as an alternative? If so, to what extent have you received mail both at your residence and your box on the same day? If not, please explain why carrier delivery was not available, to the best of your knowledge.

**INTERROGATORIES OF UNITED STATES POSTAL SERVICE
TO DOUGLAS F. CARLSON**

USPS/DFC-3. Please refer to your testimony at page 3, line 28 to page 4, line 2.

- (a) Please describe what you value about box service.
- (b) Why do you not want to receive your mail at a street address?

USPS/DFC-4.

- (a) Please refer to your testimony at page 4, lines 3 through 8. If the Postal Service's non-resident fee proposal is approved and implemented, would you
(1) keep your box service at Berkeley, assuming the fee would include the \$36 non-resident fee, (2) move your box service to Emeryville, assuming the \$36 fee would not apply, or (3) give up box service entirely, and receive all your mail by carrier delivery?
- (b) Please answer part (a) assuming, hypothetically, that a free box is available to you in Emeryville.

USPS/DFC-5. Please refer to your testimony at page 4, lines 8 to 11. Please provide all studies or other documentation that you relied upon to determine that box service in Emeryville is less satisfactory than the box service for residents of other cities.

**INTERROGATORIES OF UNITED STATES POSTAL SERVICE
TO DOUGLAS F. CARLSON**

USPS/DFC-6. Please refer to your testimony at page 4, lines 20 to 21. How are you "similarly situated" to people who live in Berkeley, given that you do not live in Berkeley?

USPS/DFC-7. Please refer to your testimony at page 5.

(a) Please provide any documentation underlying your testimony on the hours of operation at the facilities you refer to on this page.

(b) Do the hours you report represent the only hours in which access to post office boxes at these facilities is possible? How do you know?

USPS/DFC-8. Please refer to your testimony at page 7, lines 4 to 7.

(a) Please estimate how much less a box in Berkeley is worth to you than your box in Walnut Creek.

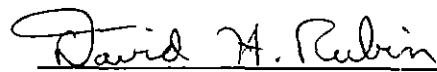
(b) *If your box in Berkeley is worth less than your previous box in Walnut Creek, why are you obtaining box service in Berkeley rather than Walnut Creek?*

USPS/DFC-9. Please refer to your testimony at page 10, lines 20 to 24.

How much less than \$40 would a box at the Laurel Station be worth to Valerie Horwitz?

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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