

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
TO REQUEST FOR ADMISSIONS OF DOUGLAS F. CARLSON
(DFC/USPS-1-4)

The United States Postal Service hereby provides responses to the following request for admissions of Douglas F. Carlson: DFC/USPS-1-4, filed on October 16, 1996.

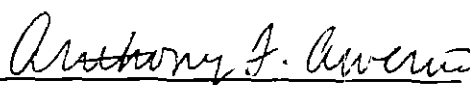
Each request is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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October 25, 1996



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1. The per-unit manufacturing cost of printing a postal card using only one ink color, in a design that is no more complex than the designs of the 20-cent postal cards that the Postal Service currently offers for sale, would be less than 1.175 cents (see USPS-T-7 at 106 and OCA/USPS-T8-35(h)). [If the Postal Service does not admit this statement, the Postal Service should reconcile its response with Witness Lyons' testimony at 2/185.]

RESPONSE:

Because all postal cards use multi-color designs, the Postal Service is without information sufficient to permit it to admit the truth of the matters asserted in this statement. Witness Lyons' statement at 2/185 reflects his intuition on this subject.

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2. The Postal Service stopped printing postal cards in a single-color design after a former postmaster general complained during the 1980's that the single-color postal cards were, in his opinion, unattractive, and he suggested or directed that the Postal Service develop and produce postal cards that were more attractive than the single-color postal cards.

RESPONSE:

Denied. Multi-color design postal cards were introduced long before single-color design postal cards were discontinued.

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3. Pursuant to a written or unwritten agreement, understanding, or procedure, the Postal Service delivers to at least one private company, individual, or government agency other than the Postal Service letters, flats, or parcels with Form 3811, Domestic Return Receipt, still attached and allows the recipient, at a later time and not under the visual supervision of a postal employee, to sign the Forms 3811, indicate the date of receipt on the Forms 3811, and then deposit the Forms 3811 in the mail.

RESPONSE:

Denied. Official acts of the Postal Service are to be performed as stated in the attachment to DBP/USPS-T1-3.

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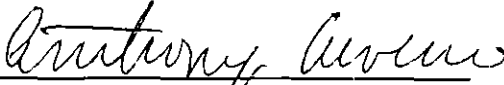
4. Pursuant to a written or unwritten agreement, understanding, or procedure, the Postal Service delivers to at least one private company, individual, or government agency other than the Postal Service letters, flats, or parcels with Form 3811, Domestic Return Receipt, still attached and allows the recipient, at a later time and not under the visual supervision of a postal employee, to sign the Forms 3811, indicate the date of receipt on the Forms employee [sic] for that employee to review to verify that the Forms 3811 were filled out accurately and completely.

RESPONSE:

The statement through the phrase "date of receipt on the Forms" is denied for the same reason as stated in response to request for admission DFC/USPS-3; the remainder of this statement does not make sense and is therefore denied.

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.


Anthony F. Alverno

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