

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(DFC/USPS- 1-12)

January 17, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to the United States Postal Service.

The instructions contained in my interrogatories to witness Mayo (DFC/USPS-T39-1-9) are incorporated herein by reference.

Respectfully submitted,

Dated: January 17, 2000



DOUGLAS F. CARLSON

DFC/USPS-1. Please confirm that the Postal Service, in February 1988, eliminated Sunday collections and outgoing mail processing for First-Class Mail at post offices in most cities on most Sundays.

DFC/USPS-2. Please provide the docket or proceeding number at the Postal Rate Commission associated with the Postal Service's request, under 39 U.S.C. § 3661(b), for an advisory opinion on the elimination of Sunday collections and outgoing mail processing at most post offices on most Sundays.

DFC/USPS-3. Please provide an explanation of the Postal Service's current policy on Sunday collections and outgoing mail processing of First-Class Mail. Please include documents and directives.

DFC/USPS-4. Please confirm that most customers do not have access to outgoing mail processing on most Sundays for First-Class Mail without travelling a significant distance (at least 50 miles) from their home. If you do not confirm, please explain.

DFC/USPS-5. Please confirm that some customers have access to outgoing mail processing on most Sundays for First-Class Mail in their home town or by travelling a distance less than 50 miles from their home. If you do not confirm, please explain.

DFC/USPS-6.

- a. Please confirm that the Postal Service offers retail window services on Sundays in some cities that do not process outgoing First-Class Mail on most Sundays. If you do not confirm, please explain.
- b. For the retail window services describes in (a), does the Postal Service inform customers, either verbally or via signs, that their outgoing First-Class Mail will not be processed until Monday?

DFC/USPS-7. Please confirm that, all else equal, customers would value having outgoing processing of First-Class Mail on Sundays more than they would value not having outgoing processing of First-Class Mail on Sundays.

DFC/USPS-8.

- a. Please provide a list of processing plants that regularly process outgoing First-Class mail on Sundays and the reasons why these plants process outgoing First-Class Mail on Sundays while most plants do not.
- b. Does the Postal Service consider the outgoing Sunday mail-processing at the plants listed in (a) to be an operating procedure that *reduces* Postal Service costs overall? Please explain. If so, might Sunday mail processing, if reinstated, reduce overall costs at other plants, too?
- c. For the plants listed in (a), please list all other processing plants that send their outgoing mail on Sundays to the plant that processes outgoing mail on Sundays.

DFC/USPS-9.

- a. Please confirm that some processing plants do not process outgoing First-Class Mail on Saturdays and instead send their mail to another plant for processing. If you do not confirm, please explain.
- b. Please confirm that the arrangements described in (a) exist to reduce costs.
- c. In which year or years did the arrangements described in (a) begin to be implemented?
- d. Please confirm that the arrangements described in (a) were not commonly used when outgoing processing of First-Class Mail was eliminated at most processing plants on most Sundays. If you do not confirm, please explain.
- e. Has the Postal Service considered employing the model described in (a) to reinstate processing of outgoing First-Class Mail on Sundays at processing plants nationwide?

DFC/USPS-9. Please confirm that the costs of processing outgoing First-Class Mail on Sundays at the plants that regularly process outgoing mail on Sundays are attributed to First-Class Mail service. If you do not confirm, please explain.

DFC/USPS-10. Please confirm that customers who do not have local access to processing of outgoing First-Class Mail on most Sundays and who do not receive First-Class Mail that was deposited and processed on Sunday are, nevertheless, paying for this Sunday processing through their First-Class postage rates.

DFC/USPS-11. Please explain why providing outgoing processing of First-Class Mail on Sundays in some regions but not in others does not discriminate against customers who do not live in the regions with Sunday processing and in favor of customers who do live in regions with Sunday processing.

DFC/USPS-12. Suppose two customers, one living in San Francisco and one living in an area served by a processing plant that regularly processes outgoing First-Class Mail on Sundays, place equal value on the ability to have outgoing First-Class Mail processed on Sundays if they deposit the mail at their local post office. Please confirm that the customer who lives in San Francisco receives a lower value from his First-Class Mail service than the customer who lives in the area served by a processing plant that regularly processes outgoing First-Class Mail on Sundays. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

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



DOUGLAS F. CARLSON

January 17, 2000
Emeryville, California