

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  
WITNESS SUSAN W. MAYO  
(DFC/USPS-T39-1-9)

January 17, 2000

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

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards,

discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

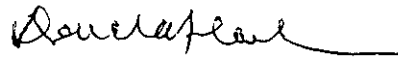
“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,



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DOUGLAS F. CARLSON

Dated: January 17, 2000

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**DFC/USPS-T39-1.**

- a. Please confirm that manual Delivery Confirmation provides proof of mailing. If you do not confirm, please explain why the postmarked Delivery Confirmation receipt does not constitute proof of mailing.
- b. Please confirm that a certificate of mailing provides proof of mailing. If you do not confirm, please explain.
- c. Please confirm that a certificate of mailing does not provide proof of delivery. If you do not confirm, please explain.
- d. Please confirm that a customer receives a greater number of services with manual Delivery Confirmation than with a certificate of mailing. If you do not confirm, please explain.
- e. Please explain why the fee for certificate of mailing should be higher than the fee for manual Delivery Confirmation.

- f. Please explain the difference in Delivery Confirmation service, if any, that a customer receives between Priority Mail Manual Delivery Confirmation and Standard Mail (B) Manual Delivery Confirmation.
- g. Please explain why the fee for Priority Mail Manual Delivery Confirmation and Standard Mail (B) Manual Delivery Confirmation should be different.

**DFC/USPS-T39-2.** Please refer to the Postal Service's responses to Docket No. R97-1 interrogatories DFC/USPS-9 and DFC/USPS-19. Please provide a complete update on the Postal Service's efforts to ensure that post offices deliver box mail by the cutoff time posted in the box lobby. Please include documentation and directives that discuss the need to deliver mail by the posted cutoff time.

**DFC/USPS-T39-3.** Please provide copies of any studies, reviews, or investigations that the Postal Service has conducted since 1997 on the quality of return-receipt service or delivery problems with return-receipt service. If the Postal Service has not conducted any studies, please explain why not.

**DFC/USPS-T39-4.** Please explain the steps that the Postal Service has taken since 1997 to resolve the types of problems with return-receipt service that led the Commission to conclude in Docket No. R97-1 that "there may be problems with the reliability of this service" (PRC Op. R97-1 at 577). Please provide an assessment of the success of any measures in resolving the problems. For both parts of this question, please provide copies of all relevant documentation, including memos and directives.

**DFC/USPS-T39-5.**

- a. Please confirm that the Postal Service revised Form 3811, Domestic Return Receipt, to include a box for delivery employees to check to indicate whether the delivery address matches the address to which the customer mailed the article (as indicated in box 1 on the form). If you do not confirm, please explain.

- b. Please provide the date on which this revised Form 3811 became available to post offices.
- c. Please provide copies of all directives and other documents that were produced to alert employees to the redesign of Form 3811 and to train delivery employees on the proper completion of the new Form 3811.
- d. Please confirm that *Postal Bulletin* often is used to communicate important changes in policies and procedures to postal employees and to announce the debut of new forms. If you do not confirm, please explain.
- e. Please provide a copy of the *Postal Bulletin* notice that explained proper completion of the new Form 3811.
- f. Please provide a copy of the *Postal Bulletin* notice that encouraged postmasters to ensure that their delivery employees were aware of the proper procedures for completing the new Form 3811.
- g. If no notice was published in *Postal Bulletin*, please explain why not.
- h. Please confirm that, all else equal, employees are more likely to complete a form properly if they have been trained on completing the form than if they have not been trained on completing the form. If you do not confirm, please explain.

**DFC/USPS-T39-6.**

- a. Please confirm that a customer who does not receive his return receipt for merchandise cannot obtain a duplicate return receipt or any other proof of delivery. If you do not confirm, please explain.
- b. Has the inability to obtain proof of delivery if the original return receipt does not arrive caused significant problems for customers using return receipt for merchandise?

**DFC/USPS-T39-7.** Please explain why the Postal Service offers a stand-alone return-receipt service for merchandise but not for non-merchandise.

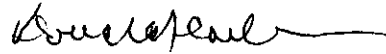
**DFC/USPS-T39-8.**

- a. Suppose customer 1 purchases certified mail plus return receipt. Please confirm that this customer would pay, under the Postal Service's proposed fees, \$2.10 plus \$1.50, for a total of \$3.60 (plus postage).
- b. Suppose customer 2 purchases return receipt for merchandise. Please confirm that this customer would pay, under the Postal Service's proposed fees, \$2.35 (plus postage).
- c. Please identify all services that customer 1 would receive that customer 2 would not receive.
- d. Please confirm that the services that customer 1 would receive that customer 2 would not receive explain and justify the \$1.25 difference in fee. If you confirm, please explain why.
- e. Based on historical data, in which percentage of cases would customer 1 need the additional services that customer 2 would not receive.
- f. In which percentage of all certified-mail transactions does a customer request a duplicate return receipt?
- g. In which percentage of all certified-mail transactions does a customer request a return receipt after mailing?

**DFC/USPS-T39-9.** Please explain the basis for using a ten-dollar rounding constraint, rather than a smaller rounding constraint, for Reserve Number. If a one-dollar rounding constraint had been used, which fee would have been proposed?

**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*.



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DOUGLAS F. CARLSON

January 17, 2000  
Emeryville, California