

**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-T39-10-22)**

January 21, 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.

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

Respectfully submitted,



DOUGLAS F. CARLSON

Dated: January 21, 2000

DFC/USPS-T39-10. Please confirm that some stations or branches of post offices that offer city carrier delivery either do not deliver mail to the post-office boxes on Saturdays or do not allow customers any access to their boxes on Saturdays. If you do not confirm, please explain why not.

DFC/USPS-T39-11. Please provide the percentage of postal facilities that have post-office boxes that either do not deliver mail to the boxes on Saturdays or do not allow customers any access to their boxes on Saturdays. Please break the data down between city-delivery offices and non-city-delivery offices. If the Postal Service does not have this data, please explain why not.

DFC/USPS-T39-12. Please confirm that, all else equal, some customers would derive greater value from their post-office-box service if they could receive and access their box mail Monday through Saturday instead of only Monday through Friday. If you do not confirm, please explain why not.

DFC/USPS-T39-13. Please explain why customers who have a post-office box at a facility that does not deliver mail to the boxes on Saturdays or does not allow customers access to the boxes on Saturdays should not pay a fee that is lower than the fee that box customers who can receive mail Monday through Saturday pay.

DFC/USPS-T39-14. On a recent Saturday, I checked the mail at my post-office box in Berkeley, California, at 11:30 AM, after the posted 11:00 AM cutoff time for delivery of First-Class Mail. On the following Monday, a Priority Mail parcel had been delivered to my box. My post office stamped it as received on Saturday. The parcel had a Delivery Confirmation label. The Web tracking system indicated that the parcel was delivered at 9:02 AM on Saturday. On a previous occasion, a Priority Mail parcel was scanned as delivered at approximately 7:30 AM, even though mail distribution to my box, which is located in rented space in a building one block from the main post office, rarely begins before 9:00 AM or 10:00 AM.

- a. In light of these examples, please explain the exact meaning of “delivery” for the Delivery Confirmation service.
- b. Does “delivery” mean the moment when the article is made available to the customer?
- c. Please provide all documentation and instructions to delivery employees concerning the proper moment in the delivery process to scan Delivery Confirmation bar codes.

DFC/USPS-T39-15. Please provide the proposed box size fee group for boxes that have the following ZIP Codes: 94701, 94704, 94712, 94623, 94596, and 95061.

DFC/USPS-T39-16. Please refer to current DMCS section 921.222.

- a. Is this service also known as “firm holdout”? If not, please provide the common name for this service.
- b. Is this service being eliminated? If so, please explain why.

DFC/USPS-T39-17. Please refer to current DMCS section 941.26. How does a mailer obtain a copy of the original mailing receipt for certified mail? Is a copy kept at the mailing post office?

DFC/USPS-T39-18. Please refer to your testimony at page 43, lines 17-19. Please identify all alternatives to certified mail, including the specific services (e.g., proof of mailing, proof of delivery) that those alternatives provide and the price or fee associated with each alternative.

DFC/USPS-T39-19. Why is the fee for return receipt after mailing being reduced by 50 percent? Please explain all reasons and provide relevant cost data for Docket Nos. R97-1 and R2000-1.

DFC/USPS-T39-20. Please identify all alternatives to return receipt, including the specific services (e.g., proof of delivery, hard-copy notification of date of delivery,

signature of recipient, address verification or correction) that those alternatives provide and the price or fee associated with each one.

DFC/USPS-T39-21. Please refer to your testimony at page 137, lines 8-13.

- a. Please confirm that Form 3811A, which provides the service proposed to be known as “evidence of delivery from the delivery record,” does not provide the signature of the recipient. If you do not confirm, please explain.
- b. All else equal, would customers in general place a higher value on receiving the signature of the recipient versus not receiving the signature of the recipient? If your answer is not an unqualified yes, please explain your answer.
- c. Please explain why a customer should not receive a partial fee refund if he/she must settle for a Form 3811A, rather than a Form 3811 that has the signature of the recipient?

DFC/USPS-T39-22. Please refer to Docket No. R97-1 Tr. 3/1018 at lines 13-16.

- a. Please confirm that witness Plunkett agreed that it would be a “good idea” to study the possibility of extending a stand-alone return-receipt service that shares the characteristics of return receipt for merchandise to documents sent via regular First-Class Mail, thus allowing customers to purchase this return-receipt service along with First-Class Mail without purchasing an additional service such as certified mail. If you do not confirm, please explain.
- b. Please explain the results of any study of this issue that has occurred.
- c. Please explain why the Postal Service is not proposing a return-receipt service that customers can purchase along with First-Class Mail without purchasing an additional service, such as certified mail.

- d. Please explain any plans to offer return-receipt service in the future that can be purchased along with First-Class Mail without the current requirement to purchase an additional service, such as certified mail.

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 21, 2000
Emeryville, California