

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-T39-23-25)

January 29, 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,



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DOUGLAS F. CARLSON

Dated: January 29, 2000

**DFC/USPS-T39-23.**

- a. Please confirm that Citibank receives mail via post-office-box service or caller service using a variety of post-office boxes with the address "The Lakes, NV" and ZIP Codes beginning with 889. If you do not confirm, please explain. If you are not able to confirm this statement by naming Citibank, please confirm the statement as if "Citibank" were replaced with "a remittance processor" or "a customer."
- b. Please confirm that The Lakes is not the name of a post office, station, or branch in Nevada. If you do not confirm, please explain.
- c. To the best of your knowledge, is The Lakes a city or town in Nevada?
- d. Please confirm that no addresses other than those belonging to the customer described in (a) use "The Lakes, NV" as a mailing address. If you do not confirm, please explain.
- e. Please confirm that The Lakes, NV, is an address associated only with ZIP Codes beginning with 889. If you do not confirm, please explain.
- f. Please confirm that the 889 ZIP Codes are administered by the post office in Las Vegas, NV. If you do not confirm, please explain.
- g. Please explain the origin of the name The Lakes, NV, for this customer's address and whether this name was created at the suggestion of the customer or the Postal Service.
- h. Please confirm that a customer might derive added value from his post-office-box or caller service if he had the opportunity to design his own post-office name for his delivery address. If you do not confirm, please explain.
- i. Does the Nevada customer described in this interrogatory pay any fees for the privilege of having created its own post-office name for its delivery address?
- j. Which fee schedule, if any, applies to customers who are able to create their own post-office name for their delivery addresses?

- k. Please explain the procedures for a customer to follow to create his own post-office name for mail sent to him.

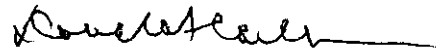
**DFC/USPS-T39-24.** At page 135, lines 15-16, you testified, "Return receipts are potentially a high value service, but some problems with the quality of service imply a lower cost coverage (Criterion 2). Please identify all known problems with the quality of return-receipt service that led you to write this statement.

**DFC/USPS-T39-25.** Please explain why fees for post-office-box service should not be based in part on the level of box service that a customer receives, such as the number of hours per week during which the box lobby is open and the availability of parcel lockers that allow customers to bypass the window line to pick up items that are too large to fit in their box.

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### 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 29, 2000  
Emeryville, California