

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

RECEIVED
FEB 11 11 41 AM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

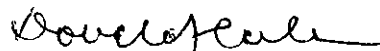
DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SCOTT J. DAVIS
(DFC/USPS-T30-8-11)

February 11, 2000

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

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.

Respectfully submitted,



Dated: February 11, 2000

DOUGLAS F. CARLSON

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

February 11, 2000
Emeryville, California

DFC/USPS-T30-8. Please refer to your response to DFC/USPS-T30-1. For certified mail, return receipt, and return receipt for merchandise, for every item or component (e.g., wage rates) that affects the cost of the service, please provide the cost that that item or component contributes to the cost of the service, in dollars and cents, for both Docket No. R2000-1 and Docket No. R97-1.

DFC/USPS-T30-9. Please discuss the extent to which the costs for certified mail and return receipt consider circumstances such as those revealed in the Inspection Service audit provided in response to DFC/USPS-T39-3 whereby postal employees skip steps or otherwise do not follow proper procedures in processing certified mail or return receipts. Or are the costs based only on studies where postal employees follow proper procedures, and complete all steps, in processing certified mail and return receipts?

DFC/USPS-T30-10.

- a. Please confirm that customers using certified mail do not need to present their mailing receipt to a window clerk if they do not need proof of mailing.
- b. Please confirm that customers using return receipt for merchandise must present their mailing at a post office or leave it in their rural mailbox.
- c. Are the window costs for a return-receipt-for-merchandise transaction greater than the window costs for the typical certified-mail transaction? Please explain why or why not.
- d. Except for the option to purchase restricted delivery for an additional fee, please explain precisely the service elements (e.g., proof of mailing, proof of delivery, etc.) that a customer of certified mail receives that a customer of return receipt for merchandise does not receive.
- e. Except for the option to purchase restricted delivery for an additional fee, please confirm that a customer of return receipt for merchandise receives every service element that a customer who purchases certified mail plus return receipt receives. If you do not confirm, please explain.
- f. Please explain why and how — logically — the costs for certified mail plus return receipt can be higher than the cost for return receipt for merchandise.

DFC/USPS-T30-11.

- a. Please provide the percentage of manual Delivery Confirmation transactions for which the customer actually obtains proof or evidence of mailing.
- b. Please confirm that certificate of mailing provides evidence of mailing.
- c. Please confirm that Delivery Confirmation provides evidence of mailing. If you do not confirm, please explain.
- d. Please explain why and how — logically — certificate of mailing can have a *higher* cost than Delivery Confirmation.
- e. Please explain why and how — logically — manual Delivery Confirmation for Priority Mail can have a lower cost than manual Delivery Confirmation for Standard Mail (B).