

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 MAURA ROBINSON
(DFC/USPS-T34-4-15)

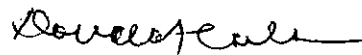
February 11, 2000

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

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: February 11, 2000

DFC/USPS-T34-4. Please refer to your response to DFC/USPS-T34-3. Of the total volume of Priority Mail flat-rate envelopes in FY 1998, please confirm that:

- a. 28.62 percent of the flat-rate envelopes weighed three ounces or less. If you do not confirm, please provide the correct percentage.
- b. 77.00 percent of the flat-rate envelopes weighed one pound or less. If you do not confirm, please provide the correct percentage.

DFC/USPS-T34-5. Please refer to your response to DFC/USPS-T34-2.

- a. In the passage from the Commission that you quoted, please confirm that the lowest Priority Mail rate being recommended in Docket No. R90-1 was equal to the two-pound rate. If you do not confirm, please explain.
- b. Please confirm that customers who find the two-pound rate for flat-rate envelopes convenient and simple likely would continue to find the rate for flat-rate envelopes to be convenient and simple if this rate were the one-pound rate. If you do not confirm, please explain.

DFC/USPS-T34-6. Please provide the following information regarding Priority Mail. If possible, please provide aggregate data as well as data for only the mail that is entered into the mail stream via retail window transactions. If possible, please break the data down by one-ounce increments. The requested information is:

- a. The percentage of Priority Mail volume where the delivery standard provides for delivery in more days than the delivery standard for First-Class Mail.
- b. The percentage of Priority Mail volume where the delivery standard provides for delivery in fewer days than the delivery standard for First-Class Mail.
- c. The percentage of Priority Mail volume where the delivery standard provides for delivery in the same number of days as the delivery standard for First-Class Mail.

DFC/USPS-T34-7. Suppose a customer needs to mail a sheet of letter-size paper that would fit in a #10 envelope from Oakland, California, to Raleigh, North Carolina. This customer wants his letter to arrive in Raleigh as quickly as possible. He does not wish to pay for Express Mail service, and he desires no additional services such as Delivery Confirmation. If offered the choice between two services that have the same price, he will choose the lower-priced service. He is not concerned with any visual impact of Priority Mail packaging on the delivery end. Suppose further that this customer approaches a retail window clerk in Oakland for assistance in sending this document.

- a. Please confirm that nothing unusual exists about the scenario described in this question or this customer's preferences to suggest that this situation would be atypical of a retail transaction that may occur in Oakland. If you do not confirm, please explain.
- b. Please provide the delivery standard between Oakland and Raleigh for Priority Mail and First-Class Mail.

- b. Please explain the delivery options that the window clerk should discuss with this customer. Please provide all training and other documentation that guides the window clerk's encounter with this customer regarding selection of the appropriate type of delivery service.
- c. Will or could the window clerk's retail terminal provide the window clerk with the delivery standard for First-Class Mail or Priority Mail to Raleigh? If so, are window clerks instructed to consult this information routinely and provide it to customers?
- d. Please confirm that the window clerk may or should inform the customer that Priority Mail, while not guaranteed, provides delivery in two to three days. If you do not confirm, please explain.
- e. Please confirm that, based on the representation that Priority Mail provides delivery, while not guaranteed, in two to three days, this customer may choose to send his document via Priority Mail instead of First-Class Mail. If you do not confirm, please explain.
- f. Please explain any and all reasons why this customer would be better off sending his document via Priority Mail instead of regular First-Class Mail.
- g. Please confirm that this customer, whose preferences are described above, would, if informed that the delivery standard for both Priority Mail and First-Class Mail was three days, choose First-Class Mail for 33 cents, rather than Priority Mail for \$3.20. If you do not confirm, please explain.

DFC/USPS-T34-8. Please provide the following information for the most-recent fiscal year for which it is available, and please specify the measurement system from which these data are obtained:

- a. The percentage of First-Class Mail for which the delivery standard is one day that arrives in one day.
- b. The percentage of First-Class Mail for which the delivery standard is two days that arrives in two days.
- c. The percentage of First-Class Mail for which the delivery standard is three days that arrives in two days.
- d. The percentage of First-Class Mail for which the delivery standard is three days that arrives in three days.
- e. The percentage of Priority Mail for which the delivery standard is one day that arrives in one day.
- f. The percentage of Priority Mail for which the delivery standard is two days that arrives in two days.
- g. The percentage of Priority Mail for which the delivery standard is three days that arrives in two days.
- h. The percentage of Priority Mail for which the delivery standard is three days that arrives in three days.

DFC/USPS-T34-9. Please provide the delivery standard for Priority Mail that is mailed from Bangor, Maine, to Bangor, Maine.

DFC/USPS-T34-10. Please provide any data, information, or analysis to confirm that Priority Mail flat-rate envelopes weighing one to three ounces should cost less to process and transport than Priority Mail flat-rate envelopes weighing four to 16 ounces.

DFC/USPS-T34-11. Please refer to your response to DFC/USPS-T34-3. For each one-ounce increment, please provide the processing and transportation cost for those flat-rate envelopes.

DFC/USPS-T34-12. Please provide the weight of an empty Priority Mail flat-rate envelope.

DFC/USPS-T34-13. From any originating city, please discuss the extent to which *either* (1) First-Class Mail provides overnight service for a particular destination while Priority Mail would provide two-day service or (2) Priority Mail provides overnight service for a particular destination while First-Class Mail would provide two-day service. Please provide all available data.

DFC/USPS-T34-14. Please describe all Postal Service-provided mailing envelopes that qualify for the flat-rate-envelope rate.

DFC/USPS-T34-15. Please confirm that customers mailing items weighing one to 13 ounces might be more likely to use a Priority Mail flat-rate envelope, as opposed to First-Class Mail, if the proposed one-pound Priority Mail rate applied to the flat-rate envelope instead of the proposed two-pound rate. 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

February 11, 2000
Emeryville, California