

BEFORE THE RECEIVED
POSTAL RATE COMMISSION FEB 17 1 31 PM '00
WASHINGTON, DC 20268-0001
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-36-49)**

February 17, 2000

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

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

Respectfully submitted,

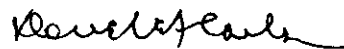
Dated: February 17, 2000



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 17, 2000
Emeryville, California

DFC/USPS-36. Please confirm that a difference exists between a mailing receipt and evidence of mailing. If you do not confirm, please explain.

DFC/USPS-37. Please explain the difference between a mailing receipt and evidence of mailing.

DFC/USPS-38. Please confirm that the Postal Service's responses to DFC/USPS-3, 5, and 8 may not be true or accurate.

DFC/USPS-39. Please refer to the response to DFC/USPS-7 and explain why Sunday processing would not have any "direct impact on service standards for First Class Mail." Are you suggesting that letters deposited on Sunday at a facility that processes outgoing mail on Sundays will not be delivered on Monday for destinations located within the designated overnight delivery area, on Tuesday for destinations located within the designated two-day delivery area, or on Wednesday for destinations located within the designated three-day delivery area? If so, please provide documents and details to support this position.

DFC/USPS-40. One factor the Commission considers in recommending postal rates is "the available alternative means of sending and receiving letters and other mail matter at reasonable costs." 39 U.S.C. § 3622(b)(5). Please explain how this criterion affects the Postal Service's requests for particular rates and cost coverages. For example, if no available alternative means exist to a particular service, does this fact imply a higher cost coverage for this service, or does it imply a lower cost coverage for this service?

DFC/USPS-41.

- a. Please confirm that Express Mail is delivered on Sundays nationwide. If you do not confirm, please explain.
- b. Does Sunday delivery of Express Mail justify a higher cost coverage for Express Mail than if Express Mail were not delivered on Sundays? Please explain.
- c. Please discuss the extent to which P&DC's accept Express Mail from customers on Sundays and process and dispatch the Express Mail on Sundays.
- d. Please discuss the extent to which customers may tender Express Mail on Sundays at staffed post offices and have this Express Mail dispatched on Sunday.
- e. Please discuss the extent to which P&DC's accept Priority Mail from customers on Sundays and process and dispatch the Priority Mail on Sundays.
- f. Please discuss the extent to which customers may tender Priority Mail on Sundays at staffed post offices and have this Priority Mail dispatched on Sunday.
- g. Please confirm that the ability of customers to tender Express Mail at some postal facilities on Sundays and have this Express Mail processed and

dispatched on Sunday raises the value of Express Mail as compared to other classes of mail that will not be processed and dispatched on Sunday.

- h. Please confirm that the ability of customers to tender Priority Mail at some postal facilities on Sundays and have this Priority Mail processed and dispatched on Sunday raises the value of Priority Mail as compared to other classes of mail that will not be processed and dispatched on Sunday.

DFC/USPS-42.

- a. Please provide a copy of the page from a recent edition (past two to four months) of *Postal Life* that lists the locations of postal facilities that offer window service 24 hours a day, 7 days a week.
- b. For each of the facilities listed, please explain whether (i) First-Class Mail, (ii) Priority Mail, and (iii) Express Mail will be processed and dispatched if a customer tenders it to that facility on a Sunday.

DFC/USPS-43. Please refer to the response to DFC/USPS-6(b). Please state the basis for this response and provide any policies, guidelines, or directives that exist on this subject.

DFC/USPS-44. Suppose a participant planned to submit testimony or a brief to the Commission arguing that the cost coverages for Priority Mail, Express Mail, and First-Class Mail should consider the extent to which these services are available to customers seeking to tender this mail to the Postal Service on Sundays for Sunday processing and dispatch. Suppose, further, that the participant proposed, on this basis, cost coverages different from those that the Postal Service has proposed. Please confirm that the accuracy and reliability of the participant's analysis and the Commission's deliberation would be enhanced by true and accurate answers to interrogatories seeking to know which P&DC's regularly process outgoing First-Class Mail on Sundays, compared to the analysis and deliberation that would result from reliance on untrue or inaccurate answers to interrogatories on the same subject. If you do not confirm, please explain.

DFC/USPS-45. Please provide true and accurate responses to DFC/USPS-3, 5, and 8.

DFC/USPS-46. Please describe the meaning and use of FIM "D".

DFC/USPS-47.

- a. Please describe the meaning and function of performance clusters.
- b. Please provide a list of all the performance clusters and the administrative and functional units (e.g., districts, P&DC's, etc.) contained therein.

DFC/USPS-48. Please refer to the response to OCA/USPS-23(b). Please explain the procedure for ensuring correct postage payment for DPS-sorted First-Class Mail.

DFC/USPS-49. Please explain how PETE scores are calculated and provide documents explaining the operation of the system.