

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-T39-30-41)

February 17, 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: February 17, 2000

DFC/USPS-T39-30.

- a. Please confirm that your response to DFC/USPS-T39-5(c) represents the full extent to which the Postal Service has issued directives and other documents to alert employees to the redesign of Form 3811 and to train delivery employees on the proper completion of the new Form 3811. If you do not confirm, please provide the missing information.
- b. Please provide all evidence that the Postal Service possesses indicating that delivery employees are familiar with the new Form 3811 and are completing it properly.
- c. Please confirm that a Form 3811 that is returned to the customer with neither box checked has not been completed correctly by the Postal Service.
- d. Please provide any available evidence confirming that stand-up talks have been conducted at the local level to discuss the new Form 3811.
- e. Please provide all evidence revealing the extent to which delivery employees are checking either the "yes" box or the "no" box on new Forms 3811.

DFC/USPS-T39-31.

- a. Please confirm that the Postal Service has a measurement system to determine the extent to which delivery employees are scanning Delivery Confirmation bar codes. If you do not confirm, please explain.
- b. Please provide documents explaining the function and operation of the system described in (a).
- c. Please provide the percentage of delivery offices that this system measures.
- d. Which percentage of Delivery Confirmation mail is delivered in areas subject to this measurement system?
- e. Does this measurement system compare the actual time of delivery with the time of the delivery scan or the time of the delivery scan recorded in the tracking system? Or does this system only check to ensure that the test piece was scanned, regardless of the time of the scanning?
- f. Please provide recent performance results from the system described in (a).

DFC/USPS-T39-32. Please refer to your response to DFC/USPS-T39-7.

- a. Please explain the process by which the Postal Service solicits, reviews, or responds to input from non-organized groups of mailers, such as consumers and the general public.
- b. Please provide all evidence concerning the percentage of transactions for certified mail plus return receipt where the mailer would have purchased solely the return receipt if certified mail had not been a prerequisite for purchasing return receipt.
- c. Please confirm that a stand-alone return-receipt service would not be popular with customers. If you do not confirm, please explain.

DFC/USPS-T39-33. Please refer to your response to DFC/USPS-T39-9 and explain the basis for a ten-dollar rounding constraint for the fee for caller service.

DFC/USPS-T39-34. The Inspection Service audit report provided in response to DFC/USPS-T39-3 states, "We found an antiquated computer system made it difficult and time consuming to research the many claims which were received by the District's Consumer Affairs Office." Attachment to Response to DFC/USPS-T39-3 at page 3 (final sentence). Please provide all available information on the number of claims.

DFC/USPS-T39-35.

- a. Please explain why the Postal Service does not offer Delivery Confirmation along with First-Class Mail service.
- b. Please confirm that a customer who wishes to mail a one-ounce letter via First-Class Mail and who desires to know only that the letter was delivered currently must purchase return receipt *plus* certified mail, registered mail, or insured mail to obtain this information. If you do not confirm, please explain.
- c. Please confirm that most customers who purchase certified mail and return receipt for their First-Class Mail desire more information than just knowledge that the article was delivered. If you do not confirm, please explain and provide all available evidence.

DFC/USPS-T39-36. Please refer to your response to DFC/USPS-T39-10.

- a. Please provide the national policy or other guidelines that explain the "unique local circumstances" under which no delivery or access to post-office boxes is permissible.
- b. To enhance the record on this subject via examples, please explain why customers may not receive mail and access their post-office boxes on Saturdays at the Byron Rumford Station in Oakland, California, the post office in Babb, Montana, and the station located in the Port Authority Bus Terminal in New York, New York.
- c. Please provide the approximate year in which the building housing the Byron Rumford Station was constructed.
- d. Please confirm that access to the box section on Saturdays at the Byron Rumford Station could not have been accommodated architecturally. If you do not confirm, please explain.

DFC/USPS-T39-37. Please explain how the Postal Service determined that the boxholder's city of residence was a significant enough factor to warrant a special fee (see Docket No. MC96-3) while the number of days on which a customer can receive mail at his box is not significant enough to warrant fee differentiation. Please provide the policy governing establishment of separate fee categories.

DFC/USPS-T39-38. These questions concern Form 3800, Certified Mail Receipt.

- a. Please confirm that the version issued in April 1995 had a number consisting of 10 alphanumeric characters. If you do not confirm, please explain.
- b. Please confirm that the bar-coded version issued in July 1999 has a number 20 numeric characters long. If you do not confirm, please explain.
- c. Please confirm that either the customer or the window clerk must write the certified-mail number on the return receipt if the customer wishes to purchase a return receipt. If you do not confirm, please explain.
- d. Please confirm that a certified-mail number that is twice as long as the old one will increase the length of time required for a customer or window clerk to place this number on the return receipt. If you do not confirm, please explain.
- e. Please confirm that the length of the new number may increase window-service costs associated with certified mail and return receipt.
- f. Has the Postal Service considered designing a Certified Mail Receipt that has a tiny removable label on which the certified-mail number is printed that can be peeled off and placed in the box for article number on the return receipt? Please provide details.
- g. If the Postal Service has not considered the label described in (f), do you believe that this removable label might increase the value of certified-mail service to customers or reduce window-service costs? Please explain.

DFC/USPS-T39-39. Please provide the overall cost coverage for post-office boxes that resulted from implementation of the fees approved in Docket No. R97-1.

DFC/USPS-T39-40. For each box group and box size, please provide the cost coverage that resulted from implementation of the fees approved in Docket No. R97-1.

DFC/USPS-T39-41. Please provide the cost coverage for each box group and box size proposed in Docket No. R2000-1.

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