

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-T39-23(H), 24-26(A), 26(C), 29)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of Douglas F. Carlson: DFC/USPS-T39-23(h), 24-26(a), 26(c), and 29, filed on February 7, 2000. Objections were filed to interrogatories DFC/USPS-T39-23, parts a to g, and i, and DFC/USPS-T39-26(b), and 27 on February 15, 2000. Interrogatories DFC/USPS-T39-23(j-k) and 28 have been redirected to the Postal Service.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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February 22, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**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.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
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**DFC/USPS-T39-23 (CONTINUED)**

**RESPONSE:**

a-g. Objection filed February 15, 2000.

h. Confirmed.

i. Objection filed February 15, 2000.

j-k. Redirected to the Postal Service.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
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**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.

**RESPONSE:**

Please see my response to DFC/USPS-T39-3 and PRC Op., R97-1, at 577.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**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.

**RESPONSE:**

Post office box fees are designed in part based on the value of service to the customer. A discussion of the value of service criterion is presented in my testimony on page 109. It is important to note that the value of service criterion discussed in my testimony applies generally to all post office box customers who have the alternative option of carrier delivery. This criterion concerns the overall value of service for box service, and is used to determine the general level of post office box fees. The criterion is not intended to reflect differences in the value of service for particular post office box customers, or at various post offices. Basing fees on the level of post office box service at different post offices might also contradict the statutory concern for fee simplicity. See my response to DFC/USPS-T39-13.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T39-26.**

- a. Should a post-office-box customer expect to receive incoming mail at his post-office box on a holiday? Please explain your answer fully.
- b. Please explain the procedures that a box customer should follow if he does not receive mail at his post-office box on holidays but Postal Service policy provides for distribution of mail to his post-office box on holidays.
- c. Please confirm that delivery of mail to post-office boxes on holidays is a component of the value to customers of post-office-box service. If you do not confirm, please explain.

**RESPONSE:**

- a. Domestic Mail Manual Section G011.1.5 shows that post office box delivery service on holidays is determined by national, area, and/or district guidelines. I am not aware of any national guidelines. It is my understanding that local guidelines might permit mail to be delivered to boxes on holidays, primarily to ensure that service standards for the following day can be met, rather than to provide an additional service to customers. Thus, customers generally should not expect mail delivery to post office boxes on holidays.
- b. Objection filed February 15, 2000.
- c. While particular customers might value holiday delivery of mail to post office boxes, such delivery, if and when performed, is done for the convenience of the Postal Service and would not be a component of the value of service criterion I used in designing post office box fees. See my response to DFC/USPS-T39-25.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO  
INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-T39-29.**

- a. Will customers be able to purchase Priority Mail manual Signature Confirmation without also purchasing Delivery Confirmation?
- b. Please confirm that Signature Confirmation will provide every service that Delivery Confirmation provides. If you do not confirm, please explain.
- c. Please refer to your testimony at page 143, lines 20-22 and page 144, lines 1-5. If the answer to (a) is yes, please explain why you removed the Delivery Confirmation base cost in determining the cost coverage of Signature Confirmation.

**RESPONSE:**

- a. Under my proposal, yes.
- b. Confirmed. As proposed in this proceeding, Signature Confirmation would provide every service that Delivery Confirmation would provide. See my testimony, page 145.
- c. To be consistent with the approach for electronic Signature Confirmation (see my testimony at page 143, lines 11-18) and electronic and manual Delivery Confirmation (see my testimony at page 56, lines 8-14), in all cases I used the net volume variable costs from Witness Davis (USPS-T-30, pages 7 and 11).

**DECLARATION**

I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

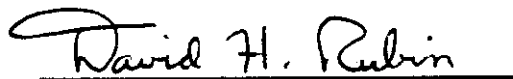
Susan W Mayo

Dated: FEB. 22, 2000



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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February 22, 2000