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BEFORE THE

**POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE TO UNITED STATES
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ELIANE VAN-TY-SMITH
(DFC/USPS-T17-1)**

February 22, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Eliane Van-Ty-Smith.

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 22, 2000

DFC/USPS-T17-1. Please refer to witness Meehan's response to DFC/USPS-T30-6 and -7. In responding to the following questions, please provide answers that a person who understands mail processing but who may not be familiar with jargon and other terms related to cost measurement and cost systems should be able to understand. Also, for these questions, if the mail-processing cost of mailing a return receipt back to the customer is identical to the mail-processing cost of a post card, you do not need to discuss the cost issues related to the mail-processing cost of post cards.

- a. To the extent that your knowledge or testimony covers this issue, please explain why costs for certified mail, return receipt, and return receipt for merchandise have increased substantially since Docket No. R97-1. In answering this question, please break the total cost for each service into each processing step or other factor (e.g., window-clerk time, carrier delivery time, etc.) that contributes to the total cost of this service and explain the amount by which, and why, that cost has increased since Docket No. R97-1.
- b. To the extent that your knowledge or testimony covers this issue, for every processing step or other factor (e.g., window-clerk time, carrier delivery time, etc.) that contributes to the cost of certified mail, return receipt, and return receipt for merchandise, please explain exactly how the cost of that step or factor is measured and calculated.
- c. Please explain any assumptions implicit in methodologies that you use or advocate for measuring costs associated with certified mail, return receipt, and return receipt for merchandise or attributing costs to those services.
- d. Please discuss any assumptions, changes in methodology, or other factors that may cause you to have any doubt about the accuracy of the costs for certified mail, return receipt, and return receipt for merchandise that are the basis for the Postal Service's proposed fees in this docket.
- e. Has the Postal Service adjusted certified-mail costs to account for the electronic signature-capture process? Please explain and provide details.

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 22, 2000
Emeryville, California