

ORIGINAL

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 SCOTT J. DAVIS
(DFC/USPS-T30-12-14)

February 22, 2000

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

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.

Respectfully submitted,

Dated: February 22, 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 22, 2000
Emeryville, California

DFC/USPS-T30-12. Please refer to your response to DFC/USPS-T30-1.

- a. Please provide, for both Docket No. R97-1 and Docket No. R2000-1, the raw data of the labor time per return-receipt transaction for clerk and carrier review functions, clearing-clerk time, and window-clerk time.
- b. If the times described in (a) have increased in Docket No. R2000-1 compared to Docket No. R97-1, please explain why.
- c. Is the “new field study” to update clearing clerks’ labor time different in methodology from the study conducted for Docket No. R97-1? If so, please explain the differences.
- d. Why does your response refer to return receipts showing “to whom, addressee’s address, and date delivered” given that Docket No. MC96-3 changed return receipt to provide a single service, which provides a return receipt showing to whom and date delivered, plus the addressee’s address *if it is different*?
- e. In the electronic version of USPS-LR-I-108, why does the Excel file titled “return receipt” appear to differentiate between “whom and date delivered” and “whom, where and date delivered”?
- f. Please provide the percentage of all return receipts for which the Postal Service provides a new address on the return receipt.

DFC/USPS-T30-13. These questions refer to the electronic version of USPS-LR-I-108 that is available at the Commission’s Web site.

- a. For each section listed in the file named “contents for USPS-LR-I-108”, please provide the name of the file that contains the section and page numbers associated therewith.
- b. Please provide the name of the electronic file that contains pp. 47-55 of USPS-LR-I-108.
- c. Please provide the name of each file that contains information relevant to costs for return receipt.
- d. Please provide the name of each file that contains information relevant to costs for return receipt for merchandise.

DFC/USPS-T30-14. Suppose a carrier is delivering a letter that was sent via certified mail, return receipt requested.

- a. Please confirm that the process of contacting the addressee (or agent) to obtain signatures (e.g., walking to the door, ringing the doorbell, waiting for a response) incurs a cost. (For this interrogatory, the process of contacting the addressee does not include obtaining the signatures.)
- b. Please confirm that the process of contacting the addressee is necessary for certified mail whether or not a return receipt is attached.
- c. To which service or service(s) are the costs described in (a) allocated — certified mail only, or both certified mail and return receipt? Please explain.