

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

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POSTAL RATE AND FEE
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
DOUGLAS F. CARLSON
(DFC/USPS-24,27-29)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson: DFC/USPS-24, 27-29, filed on February 11, 2000. The Postal Service does not concede the relevance of question 29, but, as a practical matter, finds it easier to answer than to file an objection. The Postal Service reserves its right to object to any follow-up. Information relevant to numbers 25 and 26, also filed on Feb. 11, is still being collected.

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



Eric P. Koetting

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(202) 268-2992 Fax -5402
February 25, 2000

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

DFC/USPS-24. Please provide the contents of the entire Inspection Service Special Services audit report cited in the response to DFC/USPS-T39-3. If this audit report is filed as a library reference, pursuant to Rule 31(b)(2)(ix) I request that a copy of this audit report be mailed directly to me.

RESPONSE:

Please see library reference I-200. A copy is also being mailed directly to Mr. Carlson.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON**

DFC/USPS-27. Please provide all data concerning the actual weight of flat-rate Express Mail envelopes that customers mail under current postage rates and the costs associated with flat-rate envelopes of each weight.

RESPONSE:

No such data are available.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON**

DFC/USPS-28. Suppose a customer uses an Express Mail flat-rate envelope to mail a letter that weighs one ounce. Under current rates, which rate (category and dollar amount) should or will this customer be charged?

RESPONSE:

The customer should be charged the Flat Rate, which is also the 2 pound rate, of \$15.75.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON**

DFC/USPS-29. Please confirm that some P&DC's that process their own outgoing First-Class Mail on Saturdays send their outgoing First-Class Mail to another plant on certain holidays for processing.

RESPONSE:

Confirmed, although it is unclear what relevance this may have to any issue in this case.

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.



Eric P. Koetting

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