

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-T30-15-20)

February 28, 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 28, 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 28, 2000
Emeryville, California

DFC/USPS-T30-15. Please provide the city and ZIP Code of every post office that either participated in or was asked to participate in your cost studies on return receipt and return receipt for merchandise. Please specify which offices actually participated.

DFC/USPS-T30-16. Please refer to your response to DFC/USPS-T30-10(f) and provide all evidence confirming that the explanations you provided that can or may explain the reasons why the costs for certified mail plus return receipt are higher than the cost for return receipt for merchandise *actually explain* the cost differential.

DFC/USPS-T30-17. Please refer to your response to DFC/USPS-T30-10(f) and, specifically, your discussion about costs associated with restricted delivery. Suppose a customer sends a letter via certified mail with return receipt and restricted delivery. Suppose, further, that the carrier must make a second delivery attempt because the addressee was not available to accept delivery, but another person at the addressee's residence or business was available. Under these circumstances, are the costs associated with a second delivery attempt or a call window attributed exclusively to certified mail or restricted delivery, or does return receipt bear some of these costs? Please explain fully the allocation of costs for a second delivery attempt or a call window under the scenario described in this interrogatory. If return receipt bears some of these costs, please explain the logic of this cost allocation given that, absent the restricted delivery, a person other than the addressee would have been able to sign for the item on the first delivery attempt.

DFC/USPS-T30-18. Please refer to your response to DFC/USPS-T30-10(f). Please provide all data confirming that a window transaction for certified mail plus return receipt is, on average, longer than a window transaction for return receipt for merchandise.

DFC/USPS-T30-19. Please refer to your response to DFC/USPS-T30-11(e). Why is a portion of the Priority Mail Delivery Confirmation cost included in the cost of the Priority Mail subclass, yet similar treatment is not afforded to costs for Standard Mail (B)?

DFC/USPS-T30-20. Please refer to your response to DFC/USPS-T30-8. Please provide copies of the pages from Docket No. R97-1 to which you referred that contain information responsive to my interrogatory.