

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

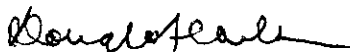
DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-50-57)

February 28, 2000

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

The instructions contained in my interrogatories to witness Mayo (DFC/USPS-1-9) are incorporated herein by reference.

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-50. Please refer to the response to DFC/USPS-T34-10 concerning Priority Mail flat-rate envelopes.

- a. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are larger than Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- b. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are smaller than Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- c. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are the same size as Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- d. Please confirm that Priority Mail flats weighing one to three ounces are, in general, likely to be larger in size than Priority Mail flats weighing four to 16 ounces. If you do not confirm, please explain and provide available evidence.

DFC/USPS-51. Please refer to the response to DFC/USPS-T34-11. Please provide, in one-ounce increments up to 32 ounces and one-pound increments beyond, available data on air and water transportation costs for First-Class Mail and Priority Mail.

DFC/USPS-52. Please provide any evidence to indicate that customers would not find the Priority Mail flat-rate envelope to be simple and convenient if the rate that applied to flat-rate envelopes were the proposed one-pound rate, rather than the proposed two-pound rate.

DFC/USPS-53. Please refer to the response to DFC/USPS-T34-13 and provide the ZIP Code pairs referenced in parts (1) and (2) of the response.

DFC/USPS-54. Please refer to the response to DFC/USPS-T34-8 and provide, for each subpart of the original interrogatory, the information that is available from *all* pertinent measurement systems, including EXFC and PETE.

DFC/USPS-55. For each problem type listed in the response to DFC/USPS-T39-28, please provide the number of complaints received for each of the past three years for which data are available.

DFC/USPS-56. Please refer to the response to DFC/USPS-13(d) and explain why the length of a window transaction for certified mail is precisely identical to the length of a window transaction for return receipt for merchandise in this docket. Please explain why this identical length makes sense. Or is it just a coincidence?

DFC/USPS-57. Please provide a copy of Inspector General audit reports DS-AR-99-003, which reviewed the Government Mails Section of the Washington P&DC, and DA-AR-99-003, which identified nearly \$1 billion of potential cost avoidance for Corporate Call Management. Pursuant to Rule 31(b)(2)(ix), I request that a copy of each audit report be mailed directly to me.