BEFORE THE

POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Docket No. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

DOUGLAS F. CARLSON INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE (DFC/USPS-67-70)

March 16, 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: March 16, 2000

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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*.

Douglasent

DOUGLAS F. CARLSON

March 16, 2000 Emeryville, California

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DFC/USPS-67. Please provide a copy of the retail display that advertises certified mail and return receipt and contains the text "Tax Time Doesn't Have To Be Taxing" and "Prove It Got There." The number on the bottom of this display is T00-CCZ-IT-470.

DFC/USPS-68. Please refer to Attachment to Response to DFC/USPS-T39-3 at p. 3.

- a. The Inspection Service audit report states that the Internal Revenue Service Center in Andover, Massachusetts, "receives approximately 200,000 pieces of certified mail daily during peak tax periods; April and quarterly filings." Please determine and provide the approximately number of days on which this IRS Service Center receives "approximately 200,000 pieces of certified mail daily."
- b. Please provide an estimate of the total number of pieces of certified mail per year that the IRS Service Center in Andover, Massachusetts, receives. If approximate annual data are not available, please provide data for the longest time period for which data are available.
- c. In the event that responsive answers are not provided in part (a) or part (b), please provide the minimum volume of certified mail that is known with reasonable certainty. For example, if each of four filing periods has at least four peak days, and if the IRS Service Center receives approximately 200,000 pieces of certified mail daily during peak periods, please report that the minimum volume is $200,000 \times 4 \times 4 = 3.2$ million.
- d. If data are available on the approximate number of pieces of certified mail received by any other recipients discussed in the audit report, please provide the data for the longest time period (up to a year) for which data are available.
- e. Please provide all estimates of the proportion of total certified-mail volume and return-receipt volume that is destined to government agencies.

DFC/USPS-69. Please refer to the response to DFC/USPS-47.

- a. Please explain how one "can see" that some facilities report directly to area offices.
- b. Please explain, using an example, the statement that performance clusters "have the same geographic boundaries as districts."
- c. As an example, please explain how one would determine from the list provided in the interrogatory response the performance cluster in which the San Jose *District* (not the San Jose P&DC) resides.
- d. Please explain how one would determine from the list provided the performance cluster in which the McAllen, Texas, P&DF resides.
- e. Please provide a list that shows the performance cluster in which each district resides.

DFC/USPS-70. Please provide recent national EXFC performance data for every category available (e.g., flats, letters, SPR's; handwritten, typewritten, bar-coded; etc.).