



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 SUSAN W. MAYO
(DFC/USPS-T39-42-68)

March 20, 2000

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

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: March 20, 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

March 20, 2000
Emeryville, California

DFC/USPS-T39-42. Please refer to your response to DFC/USPS-T30-30, 5(c), and 5(h). Please provide all directives, communications, and other written documents or publications that Postal Service headquarters has issued to field offices or employees alerting them to or otherwise informing them of the July 1999 redesign of Form 3811 or to train delivery employees on the proper completion of the new Form 3811.

DFC/USPS-T39-43. Please provide all facts and information that the Postal Service possesses or of which the Postal Service is aware indicating that delivery employees are familiar with the new Form 3811 and are completing it properly.

DFC/USPS-T39-44. Please explain the process by which the Postal Service is evaluating the extent to which delivery employees are checking one of the two boxes in section D on the new Form 3811. Please provide the results of all studies, evaluations, audits, and reviews.

DFC/USPS-T39-45. Please refer to your response to DFC/USPS-T39-30(b) and explain specifically how your continued contact with postal field employees causes you to believe that delivery employees are being properly trained in completing new and revised forms, including Form 3811. Please provide specific information about conversations that you have had, and please provide all relevant e-mail messages or other written correspondence.

DFC/USPS-T39-46. Please provide a copy of the July 1999 version of Form 3811.

DFC/USPS-T39-47. Please confirm that a Form 3811 (July 1999 version) that is returned to the customer with neither of the boxes in section D checked has not been completed correctly by the Postal Service. If you do not confirm, please explain.

DFC/USPS-T39-48. Please provide all available facts and information confirming that stand-up talks have been conducted at the local level to discuss the new Form 3811.

DFC/USPS-T39-49. To the extent that you have knowledge of facilities that have conducted stand-up talks to discuss the new Form 3811, please identify them.

DFC/USPS-T39-50. Please provide all facts and information revealing the extent to which delivery employees are checking either the "yes" box or the "no" box in section D of new Forms 3811.

DFC/USPS-T39-51. Please provide documents explaining the function or operation of the measurement system that determines the extent to which delivery employees scan Delivery Confirmation bar codes. Please also provide documents explaining the method by which this system determines the extent to which delivery employees scan Delivery Confirmation bar codes.

DFC/USPS-T39-52. Please refer to your response to DFC/USPS-T39-32(a). Please provide an approximate number of inquiries that you reviewed and to which you responded during calendar year 1999 (or any one-year period that you select and identify).

DFC/USPS-T39-53. Please refer to your response to DFC/USPS-T39-32(a). Please identify the special services for which your department has performed market research or other special studies since January 1, 1996, and provide documents describing the results of the market research and special studies.

DFC/USPS-T39-54. Please estimate the number of members of the general public who do not work in the mailing community who attended Postal Forums in 1999.

DFC/USPS-T39-55. Please provide all facts and information concerning the percentage of transactions for certified mail plus return receipt where the mailer would have purchased solely the return receipt if certified mail had not been a prerequisite for purchasing return receipt.

DFC/USPS-T39-56. Please refer to your response to DFC/USPS-T39-32(c). For all changes in special services that the Postal Service proposed in Docket No. MC96-3, please identify the nature, if any, of the interest in those changes that you heard from postal customers prior to filing Docket No. MC96-3 with the Commission. Please quantify the number of communications of interest received for each change.

DFC/USPS-T39-57. Please refer to your response to DFC/USPS-T39-32(c). Do you believe that the interest expressed by individual intervenors in Commission cases for a stand-alone return-receipt service is unrepresentative of the interest in this service among the American public? If yes, please provide facts and information in support of your position.

DFC/USPS-T39-58. Please confirm that a customer who wishes to mail a one-ounce letter containing a bank check at the one-ounce single-piece First-Class Mail rate and who desires to know only that the letter was delivered currently must purchase return receipt *plus* certified mail or registered mail to obtain this information. If you do not confirm, please explain.

DFC/USPS-T39-59. Please refer to your response to DFC/USPS-T39-35(b). Please provide a citation to the DMM or DMCS that confirms that a one-ounce letter would qualify as "merchandise."

DFC/USPS-T39-60. Please refer to your response to DFC/USPS-T39-37. Please discuss the steps that you have taken to determine the number of facilities that do not deliver box mail on Saturdays and to examine any hardship for boxholders who do not receive mail at their post-office box on Saturdays.

DFC/USPS-T39-61. Please refer to your response to DFC/USPS-T39-37. Please explain how you determined, without knowing the number of facilities that do not deliver box mail on Saturdays, that fee differentiation based on whether a customer can receive box mail on Saturdays is not warranted.

DFC/USPS-T39-62. Please refer to your testimony at page 43, lines 17–19. For a customer who wishes to send a letter via First-Class Mail, please identify all alternatives that exist to certified mail, including the specific services (e.g., mailing receipt, proof of delivery) that those alternatives provide. For this interrogatory, assume that the letter weighs 13 ounces or less, and the customer wishes to pay the single-piece First-Class

Mail (not Priority Mail) rate corresponding to the weight of the letter. Assume that the letter contains only documents.

DFC/USPS-T39-63. Please refer to your response to DFC/USPS-T39-25.

- a. Please provide all information you have, including legislative history and Commission precedent, supporting your assertion that the value-of-service criterion “is not intended to reflect differences in the value of service for particular post office box customers, or at various post offices.”
- b. Please confirm that the non-resident fee for post-office boxes that the Postal Service proposed in Docket No. MC96-3 was based, in part, on a contention that non-resident boxholders receive a higher value of service than resident boxholders. If you do not confirm, please explain and provide citations to the record.

DFC/USPS-T39-64. Please refer to your response to DFC/USPS-31. Please confirm that Table B accurately summarizes information contained in the DMM pertaining to the service elements a customer may receive if he purchases certificate of mailing (middle column) or manual Delivery Confirmation (right column). If you do not confirm, please explain fully and correct this table.

TABLE B

Service Element	Certificate of Mailing	Manual Delivery Confirmation
Mailing Receipt	Yes	Available
Evidence of Mailing	Yes	No
Delivery Confirmation	No	Yes
Record of Delivery	No	No
Available with any mail class	Yes	No
Available with any special service	Yes	No

DFC/USPS-T39-65. Please provide all facts and information the Postal Service has indicating that customers would not, in general, place a higher value on receiving mail at their post-office box Monday through Saturday than Monday through Friday only.

DFC/USPS-T39-66. Please refer to your response to DFC/USPS-T39-26. Please explain why “customers generally should not expect mail delivery to post office boxes on holidays” given that POM § 125.22 requires incoming mail to be delivered to boxes on holidays at the main office and “generally” also at stations and branches.

DFC/USPS-T39-67. Please refer to your response to DFC/USPS-T39-26. Please also refer to POM Exhibit 125.22. Please provide copies of exceptions approved by the chief operating officer and executive vice president pertaining to the subject of DFC/USPS-T39-26(a).

DFC/USPS-T39-68. Why did the Postal Service not implement the amendment to DMM § D042.1.7 that it proposed in 63 Fed. Reg. 12,874 (1998)?