

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-58-64)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson: DFC/USPS-58-64, filed on March 13, 2000.

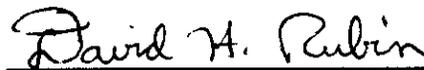
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



David H. Rubin  
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March 27, 2000

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

**DFC/USPS-58.** Please provide the total number of delivery offices (including post offices, stations, and branches).

**RESPONSE:**

While the exact number of delivery offices is not available, the total number of offices (including post offices, stations, and branches) for FY 1998 was 38,159, according to the United States Postal Service 1998 Annual Report.

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

**DFC/USPS-59.** Please provide the total number of carrier and rural routes nationwide.

**RESPONSE:**

In FY 1998 there were approximately 227,000 carrier and rural routes nationwide.

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

**DFC/USPS-60.** Please provide the average number of return receipts delivered per day nationwide.

**RESPONSE:**

Based on FY 1998 data of return receipt volume and delivery days, the average number of return receipts delivered per day nationwide was approximately 782,700.

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

**DFC/USPS-61.** Please provide the average number of return receipts delivered per carrier or rural route per day.

**RESPONSE:**

Based on FY 1998 data of return receipt volume, delivery days, and carrier and rural routes, the average number of return receipts delivered per carrier or rural route per day was approximately 3.4.

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

**DFC/USPS-62.** Please provide the average number of return receipts delivered per delivery office per day.

**RESPONSE:**

Based on FY 1998 data of return receipt volume, delivery days, and offices, the average number of return receipts delivered per office per day was approximately 20.5.

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

**DFC/USPS-63.** Suppose a return receipt is attached to a letter. At which point, from acceptance of the letter to delivery of the return receipt to the sender, is the return receipt counted in total return-receipt volume?

**RESPONSE:**

In the Domestic RPW sampling system, the return receipt is counted at the point of exiting the postal network, such as when the piece is delivered. For a typical delivery of a piece with a return receipt attached, the mailpiece would generate at least two observations: the first for the parent mailpiece, and additional observations for each attached special service, such as certified and return receipt. When the return receipt is returned to sender it would be counted in the Domestic RPW sampling system as a First-Class penalty mail card, and not as a return receipt transaction.

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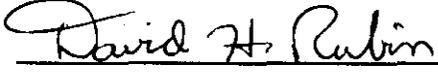
**DFC/USPS-64.** Suppose a return receipt is attached to a letter. Suppose, further, the letter is returned to sender because the recipient moved and left no address. Will this return receipt be counted in total return-receipt volume? Does the answer depend on whether the sender obtains a refund for the fees paid for the return receipt?

**RESPONSE:**

No, the letter that is returned to sender with a return receipt attached would not generate a return receipt observation and would thus not be counted in return receipt volume. This answer does not depend on whether or not a refund is processed.

**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.

  
David H. Rubin  
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