

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
FOLLOW-UP INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MAURA ROBINSON
(DFC/USPS-T34-16-23)

March 27, 2000

Pursuant to Rules 25-27, I hereby submit follow-up interrogatories to United States Postal Service witness Maura Robinson.

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,

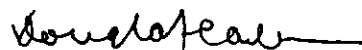
Dated: March 27, 2000



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 27, 2000
Emeryville, California

DFC/USPS-T34-16. Please refer to your response to Presiding Officer's Information Request No. 5, Question 7. Please assume that a customer desires to send items via Priority Mail, and these items would fit in a Priority Mail flat-rate envelope. The weight of the customer's mail, including mailing container, is more than two pounds.

- a. Please confirm that, under current rates, this customer may use a Priority Mail flat-rate envelope and pay \$3.20. If you do not confirm, please explain.
- b. Please confirm that, under current rates, this customer may use a mailing container other than a flat-rate envelope and pay the rate corresponding to the weight of the mail piece. If you do not confirm, please explain.
- c. In (b), please confirm that the rate will be \$4.30 or more. If you do not confirm, please explain.
- d. Please confirm that this customer has an incentive, under current rates, to use a flat-rate envelope because the flat-rate envelope would save this customer at least \$1.10 in postage. If you do not confirm, please explain.
- e. Please confirm that, under the proposed rates, this customer may use a flat-rate envelope and pay \$3.85. If you do not confirm, please explain.
- f. Please confirm that, under the proposed rates, this customer may use a mailing container other than a flat-rate envelope and pay the rate corresponding to the weight of the mail piece. If you do not confirm, please explain.
- g. In (f), please confirm that the rate will be \$5.10 or more. If you do not confirm, please explain.
- h. Please confirm that this customer has an incentive, under the proposed rates, to use a flat-rate envelope because the flat-rate envelope would save this customer at least \$1.25 in postage. If you do not confirm, please explain.
- i. Please refer to the incentive discussed in parts (d) and (h). Do you believe that a significant number of price-sensitive customers who would not switch to a flat-rate envelope to save \$1.10 in postage would switch to a flat-rate envelope to save \$1.25 in postage? Please discuss and provide all facts and information supporting an affirmative answer to this question.

DFC/USPS-T34-17. Please refer to your response to Presiding Officer's Information Request No. 5, Question 7. Please confirm that any upward pressure over time on the one-pound rate caused by price-sensitive customers shifting to the flat-rate envelope would come primarily from customers mailing items weighing more than one pound but not more than two pounds. If you do not confirm, please explain why price-sensitive customers mailing items weighing more than two pounds would not already be using the flat-rate envelope under current rates.

DFC/USPS-T34-18. Is it reasonable to assume that most EP-14B flat-rate envelopes that customers send weigh one pound or less, given that the dimensions of this envelope are 6" x 10"? Please explain and provide any available data on this subject.

DFC/USPS-T34-19. Please provide all facts and information indicating that a significant portion of the Priority Mail volume that weighs more than one pound but not more than

two pounds that currently is not mailed in a flat-rate envelope would shift to a flat-rate envelope if the proposed one-pound rate applied to flat-rate envelopes. In your answer, please acknowledge the likelihood that some portion of the volume in question would not fit in a flat-rate envelope or that a flat-rate envelope would not provide sufficient packaging protection for the items being mailed.

DFC/USPS-T34-20. Suppose a Priority Mail article weighs three ounces or less. Is it reasonable to assume that a substantial portion of postal customers is able to discern, without the aid of a scale, that this Priority Mail article does not weigh over one pound? If your answer is not an unqualified yes, please explain.

DFC/USPS-T34-21. Please refer to your response to Presiding Officer's Information Request No. 5, Question 7. Suppose a Priority Mail article weighs less than one pound.

- a. Is it reasonable to assume that a weight exists for this item such that a substantial portion of postal customers is able to discern, without using a scale, that this Priority Mail article does not weigh over one pound? If your answer is not an unqualified yes, please explain.
- b. Is it reasonable to assume that the maximum weight for which a substantial portion of postal customers is able to discern, without using a scale, that this Priority Mail article does not weigh over one pound is more than three ounces? If your answer is not an unqualified yes, please explain.
- c. For customers who know, without using a scale, that their Priority Mail items weigh less than one pound, please confirm that the absence of the need to weigh their flat-rate envelopes in order to determine the postage rate does not add value to these flat-rate envelopes for these customers. If you do not confirm, please explain.

DFC/USPS-T34-22. Please refer to your response to Presiding Officer's Information Request No. 5, Question 7. Please estimate the length of time required for upward pressure to be placed on the one-pound rate in a way that would cause you concern.

DFC/USPS-T34-23. Suppose the Commission recommends and the Postal Service implements the Priority Mail rates as they currently are proposed.

- a. If a customer visits a retail window to mail documents that will weigh one pound or less (including the mailing container) via Priority Mail, which type of packaging should the retail clerk recommend — (1) a Priority Mail flat-rate envelope or (2) Priority Mail packaging other than a flat-rate envelope? Please explain.
- b. Will the Postal Service provide a mailing container similar to the current flat-sized EP-14F flat-rate envelope (9½" x 12½") that will qualify for the weight-based rate, not the rate for flat-rate envelopes?
- c. Please confirm that the customer described in (a) would pay 40 cents extra postage if he, accustomed to having the rate for flat-rate envelopes correspond to the lowest Priority Mail rate, used a flat-rate envelope instead of his own packaging or Priority Mail packaging other than a flat-rate envelope.