

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-67, 68)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson: DFC/USPS-67 and 68, filed on March 20, 2000. Objections to interrogatories DFC/USPS-69 and 70 were filed on March 30, 2000.

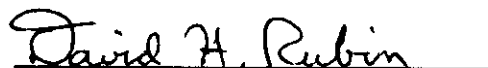
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

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(202) 268-2986; Fax -6187
April 3, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

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.

RESPONSE:

Please see page 3 of the attachment to witness Mayo's response to interrogatory

DBP/USPS-69(g).

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

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.

RESPONSE:

a. The audit report does not specify a period, and no such estimate is available.

b. These data are not tracked.


c. Even a minimum volume is not known with reasonable certainty.

d. No such data are available, except for those provided in the audit report, pages 20-21.

e. Volumes are not tracked by destination, so these proportions are not available.

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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April 3, 2000