

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

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-76, and 77(A, B, G))

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas Carlson: DFC/USPS-76, and 77(a,b,g), filed on March 23, 2000.

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

Objections to DFC/USPS-71-73, and 75, were filed on April 3, 2000. Objections to 77(c, d, f) were filed on March 31, 2000.

Interrogatory DFC/USPS-74 has been redirected to witness Davis, and a response to DFC/USPS-77(e) has not been completed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Mark W. Ro

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April 6, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DFC/USPS-76. Please refer to the response to DFC/USPS-41(d). Please explain the basis for the contention that "very few" post offices are staffed on Sundays, keeping in mind that many, if not most, post offices receive and deliver Express Mail on Sundays, receive some types of mail on Sundays, and/or dispatch available collection mail on Sundays — activities that require staff to be present.

RESPONSE:

The stated premises for this question are erroneous. Most Post Offices do **not** receive and deliver Express Mail on Sundays. For most Post Offices, Express Mail destinating on Sunday in their service area will be delivered from a nearby plant or large Post Office. Most Post Offices do **not** receive some types of mail on Sundays. Most Post Offices do **not** dispatch available collection mail on Sundays. Normally, the Postal Service will neither collect nor process collection mail on Sundays, so there will rarely be any available for dispatch. Consequently, of the Postal Service's approximately 28,000 post offices (or the approximately 38,000 post offices, stations, and branches), very few are staffed on Sundays.

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DFC/USPS-77. Please refer to the response to OCA/USPS-62.

- a. Please confirm that, under current plans, the "H" stamp, issued for implementation of the Docket No. R97-1 rates, will be the last stamp in the alpha series. If you do not confirm, please explain.
- b. Please confirm that non-denominated basic-rate stamps issued for Docket No. R2000-1 will not contain an alpha designation.
- c. Please confirm that the artistic design will be the key to determining the postage value associated with new non-denominated basic-rate stamps issued for Docket No. R2000-1. If you do not confirm, please explain.
- d. Please discuss any studies or other information that the Postal Service has to indicate that the absence of an alpha designation or rate value on postage stamps may or may not cause customer confusion in future years as customers seek to determine the value of non-denominated stamps that they have in their possession.
- e. Does the Postal Service plan to issue a non-denominated stamp for the post-card rate as well as for the single-piece one-ounce First-Class Mail rate?
- f. Please discuss the possibility that the Postal Service will have sufficient lead time before implementing new rates in 2001 to print stamps that have the new rate on them, eliminating the need for non-denominated stamps.
- g. If the Postal Service knows now that *one-cent* stamps will satisfy demand for "make-up" rate needs," please explain why the Postal Service cannot also print denominated 34-cent stamps now instead of non-denominated stamps.

RESPONSE:

- a. The Postal Service is unable to confirm that it will never revive alpha stamps. It does not plan to use one in implementing the basic FCM rate which results from R2000-1.
- b. See response to OCA/USPS-62.
- c. Objection filed.
- d. Objection filed.

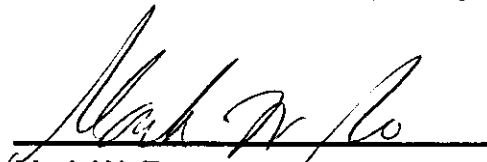
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DFC/USPS-77 (response continued):

- f. Objection filed.
- g. The Postal Service does not know what rate will be recommended by the
Commission and/or implemented by the Board.

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.


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