

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 WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-55, 57-68)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of Douglas F. Carlson: DFC/USPS-T39-42-55, and 57-68, filed on March 23, 2000. An objection was filed to interrogatory DFC/USPS-T39-56 on April 3, 2000

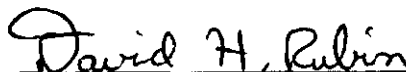
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

I assume you are referring to my responses to DFC/USPS-T39-30, 5(c), and 5(h). See my response to DFC/USPS-T39-5(c). To the best of my knowledge, Postal Service headquarters issued the Postal Bulletin notice and no other communications. I am unaware of what communications have been issued in the field.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

The Postal Service does not collect this type of information.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-43.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

I have spoken casually with field employees who are always willing to provide their opinion on the delivery of special services and new forms, services and procedures. I have no e-mail messages or written correspondence from these employees.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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

RESPONSE:

Attached.

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY | |
|--|---|---------------------|
| <ul style="list-style-type: none"> ■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. | A. Received by (Please Print Clearly) | B. Date of Delivery |
| | C. Signature | |
| 1. Article Addressed to: | X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee | |
| 2. Article Number (Copy from service label) | D. Is delivery address different from item 1? <input type="checkbox"/> Yes | |
| | If YES, enter delivery address below: <input type="checkbox"/> No | |
| | 3. Service Type | |
| | <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| | 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| PS Form 3811, July 1999 Domestic Return Receipt 102505-99-M-1789 | | |

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DBP/USPS-45(j).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

To the best of my knowledge, information on stand-up talks is not collected at the Headquarters level.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-48.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-43.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-31(b).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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).

RESPONSE:

During calendar year 1998, I responded directly or indirectly to approximately 50 inquiries.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

The results of all but one special service market research performed since January 1, 1996 by my department, or under my department's direction have been included in Dockets No. MC96-3 and R97-1, for special services including certified mail, insured mail, registered mail, and post office boxes. A survey was sent out in 1999 to C.O.D. mailers, yet due to a lack of responses no documents describing the results were prepared.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

I don't know and I would assume that this is a privacy matter. The Postal Service would not collect this information.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-32(b).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

To the best of my knowledge no individual intervenors have proposed a stand-alone return receipt service in any Commission cases. I cannot say whether your interest in this type of service is representative or unrepresentative of the American public. I have not seen anything that would indicate to me that there is even a lukewarm interest in this type of service among the general public.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

Not confirmed. The customer could simply call the recipient to see if the piece was received or ask the recipient to return an enclosed postcard when he/she receives the mailpiece. The customer could purchase just certified mail or registered mail without return receipt service, and use return receipt after mailing service if he/she becomes concerned about whether the letter was delivered.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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."

RESPONSE:

I know of no citation to the DMM or the DMCS that defines merchandise for use with return receipt for merchandise. For example, a one-ounce letter could be merchandise if it is a letter that could be bought and sold.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

I have not taken any steps to determine the number of facilities that do not deliver box mail on Saturdays, nor have I taken any steps to examine any hardship for boxholders who do not receive mail at their post office box on Saturdays. I was not even aware of this situation until you brought it up, which leads me to believe that any potential hardship from non-delivery post office boxes on Saturdays is a rare occurrence.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

See my response to DFC/USPS-T39-60. I also believe that adding a fee category related to Saturday service would be inconsistent with maintaining fee simplicity, and the Commission's support for a more cost-based fee structure.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

I am not sure what alternatives you are referring to with respect to certified mail. I am unclear as to whether you want a signature, delivery receipt, evidence of mailing, etc. Nonetheless, I could say registered mail and certificates of mailing are alternatives to certified mail. See my testimony at pages 123-124, and 36 for descriptions. Additionally, if the document is Standard Mail matter mailed at the First-Class rate, insurance is also an alternative. See my testimony at pages 60-61 for a description.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

- a. I am not an expert in legislative history. I believe my value of service criterion discussions are consistent with other witnesses in past rate cases and in this present rate case proceeding. With respect to the value of service criterion discussed in my testimony for post office box pricing, it was not my intention to discuss differences in the various services provided at individual post offices and how they may differ from each other. See my response to DFC/USPS-T39-60.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

DFC/USPS-T39-63 (CONTINUED)

RESPONSE:

- b. Not confirmed. The non-resident fee proposal in Docket No. MC96-3 was based on the pricing criteria in my testimony, USPS-T-7, including the value of service criterion discussed on pages 37-38 of that testimony. While I noted that non-residents receive a high value of service, nowhere in my testimony do I contend that non-resident boxholders receive a higher value of service than resident boxholders.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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 |

RESPONSE:

Your table appears to have all the corrections and revisions I suggested in DFC/USPS-31.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

Such information has not been collected. I believe that a customer who obtains a box at a facility that does not provide Saturday service is interested primarily in Monday through Friday service and would not value Saturday service much, if at all. Moreover, the form of the question implies that the Postal Service would collect information on what customers do not value. I do not believe this would be a very sensible approach.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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.

RESPONSE:

POM Section 125.22 and DMM Section G011.1.5 both indicate that mail may not be delivered to boxes on holidays. In addition, it is my understanding that the POM provides guidelines, rather than requirements. Therefore, I believe customers generally should not expect mail delivery to post office boxes on holidays, especially if the lobby is not open. See my response to DFC/USPS-T39-26(a).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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).

RESPONSE:

There are no exceptions approved by the Chief Operating Officer and Executive Vice President.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-42-68)**

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)?

RESPONSE:

The Postal Service decided to seek operational solutions to improve return receipt processing at high volume destinations rather than amend DMM section D042.1.7. As discussed on pages 22-23 of the Inspection Service report in LR-I-200, efforts to find operational solutions are ongoing.

DECLARATION


I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

Dated: April 6, 2000

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
David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
April 6, 2000