

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 THE UNITED STATES POSTAL SERVICE
(DFC/USPS-81-88)

April 8, 2000

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

The instructions contained in my interrogatories to witness Mayo (DFC/USPS-1-9) are incorporated herein by reference.

Respectfully submitted,

Dated: April 8, 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

April 8, 2000
Emeryville, California

DFC/USPS-81. Please refer to the response to DFC/USPS-T31-3.

- a. Please provide the number of postal facilities that offer post-office-box service that are located in Postal Service–owned buildings.
- b. Please provide the number of postal facilities that offer post-office-box service that are located in buildings owned by a government agency other than the Postal Service.
- c. Please provide the number of postal facilities that offer post-office-box service that are located in buildings owned by private, non-government agencies and for which the Postal Service pays rent.
- d. If and only if data for (a), (b), or (c) are not available, please provide the information requested in the original sentence with the clause “that offer post-office-box service” deleted.
- e. If and only if data for (a), (b), or (c) are not available, please provide the information requested in the original sentence with the clause “that offer post-office-box service” replaced with “that offer services directly to customers (excluding, e.g., vehicle-maintenance facilities and office buildings)”.
- f. Please provide the percentage of installed post-office boxes that are located in Postal Service–owned buildings.
- g. Please provide the percentage of installed post-office boxes that are located in buildings owned by a government agency other than the Postal Service.
- h. Please provide the percentage of installed post-office boxes that are located in buildings owned by private, non-government agencies and for which the Postal Service pays rent.
- i. If the percentages in (f), (g), and (h) do not sum to 100, please explain the types of buildings in which post-office boxes are located that (f), (g), and (h) do not describe.

DFC/USPS-82.

- a. If the Postal Service occupies buildings owned by government agencies other than the Postal Service, please name the top two to three government agencies (in quantity) whose buildings the Postal Service occupies.
- b. Does the Postal Service pay rent to the agencies described in (a)? Please explain.

DFC/USPS-83. Please refer to the response to DFC/USPS-T31-2. Suppose the Commission recommends and the Governors approve the new post-office-box fees that the Postal Service has proposed in this case. Can the Postal Service assure participants and the Commission that increased fee revenues will be earmarked or otherwise used to expand box facilities where box shortages exist? Please explain.

DFC/USPS-84. Please explain the process by which box-section expansions will be initiated, reviewed, and approved or denied if the proposed new box fees are implemented.

DFC/USPS-85. For each of the following stations in Oakland, California, please provide the proposed fee group for post-office boxes, and please explain where, in the “zplist4” file in USPS-LR-I-241, data for the facility are located:

- a. Civic Center Station;
- b. Byron Rumford Station.

DFC/USPS-86. Please refer to the response to DFC/USPS-77(g). If the Postal Service does not know which rate the Commission will recommend and the Governors will approve, how does the Postal Service know that *one-cent* stamps will satisfy demand from customers who have 33-cent stamps and who need the equivalent of a “make-up rate” stamp?

DFC/USPS-87. Please refer to the response to DFC/USPS-76. Suppose a customer sends an Express Mail article to a post-office box located in a facility whose box lobby is open on Sundays, but the facility does not receive Express Mail on Sunday; rather, Express Mail destined to street addresses in that facility’s service area is delivered by the plant or a large post office. The Postal Service guarantees delivery of this Express Mail article on Sunday before the closing time of the box lobby.

- a. If the sender waived the signature requirement and the Express Mail article will fit in the customer’s box, will this Express Mail article be delivered to the recipient’s post-office box on Sunday? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.
- b. If the sender did not waive the signature requirement, will a delivery attempt be made to the recipient’s post-office box? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.
- c. If the answer to (b) is yes, please confirm that the recipient will not be able to receive the article on Sunday if no staff is working at the facility. If you do not confirm, please explain.
- d. If the answer to (b) is yes, suppose that the recipient’s postal facility is staffed on Sundays. Please confirm that the recipient’s postal facility may not have a method for customers to contact the staff to pick up Express Mail articles on Sundays. If you do not confirm, please explain.
- e. If no telephone number is listed on the Express Mail label for the recipient and the recipient’s box lobby is not open on Sundays, please confirm that the Express Mail article will not be delivered on Sunday in a way that will allow the recipient to receive it on Sunday. If you do not confirm, please explain.

DFC/USPS-88. Please refer to the response to DFC/USPS-76. Suppose a customer sends an Express Mail article to a rural address — using the format RR 2, Box 100 — served by a facility that does not receive Express Mail on Sunday. Will the plant or large post office have sufficient information about rural routes to determine where RR 2, Box 100 is located, and will this Express Mail article be delivered on Sunday? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.

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DOUGLAS F. CARLSON
DESIGNATION OF WRITTEN CROSS-EXAMINATION
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON (USPS-T-34)

April 8, 2000

Pursuant to Rule 30(e)(2), I designate the following responses of Postal Service witness Robinson as my written cross-examination to be included in the record of this proceeding:

DFC/USPS-T34-2, 3, 4, 5, 7, 12, 13, 14, 15

Respectfully submitted,



DOUGLAS F. CARLSON

Dated: April 8, 2000

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

April 8, 2000
Emeryville, California