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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. MAYO
(DFC/USPS-T39-69-75)

April 14, 2000

Pursuant to Rules 25-27, I hereby submit follow-up interrogatories to United States Postal Service witness Susan W. Mayo. I received the initial responses on April 10, 2000.

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: April 14, 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 14, 2000
Emeryville, California

DFC/USPS-T39-69. Please refer to your response to DFC/USPS-T39-45. Did you speak with field employees specifically about the July 1999 version of Form 3811? If yes, please describe the approximate date or month of the conversations, the locations at which those field employees work, and the substance of the conversations, including each aspect of the Form 3811 that you discussed.

DFC/USPS-T39-70. Please refer to your response to DFC/USPS-T39-47 and DBP/USPS-45(j).

- a. Please confirm that a Form 3811 (July 1999 version) that is returned to the customer is not filled out properly unless one of the boxes in section D has been checked or a new address is provided in section D. If you do not confirm, please explain your answer and reconcile your answer with your response to DBP/USPS-45(j)
- b. Please provide documents or policies that corroborate your response to DFC/USPS-T39-47, DBP/USPS-45(j), and DFC/USPS-T39-70(a).

DFC/USPS-T39-71. Presently, a customer seeking to mail documents in a standard-size envelope that weighs one ounce via certified mail, return receipt requested, pays 33 cents in postage, \$1.40 for certified mail, and \$1.25 for the return receipt, for a total of \$2.98. Suppose that this customer wants every service element (e.g., proof of mailing) that certified mail plus return receipt provide. For the customer described in this interrogatory, please identify all alternative services that the Commission should consider when evaluating your proposed fees for certified mail and return receipt under Criterion 5. For each service, please provide the total cost to the customer for using that service (including postage and fees, if the service is a Postal Service–provided service). In addition, for each service, please explain the service elements that the alternative service provides that certified mail plus return receipt do not provide, and please explain the service elements that certified mail plus return receipt provide that the alternative services do not provide.

DFC/USPS-T39-72. Please refer to your response to DFC/USPS-T39-61. Do you believe that the Commission’s support for a cost-based fee structure indicates the Commission’s preference for a smaller emphasis on value of service than the Commission has applied in previous cases? If yes, please explain and provide citations to the Commission’s opinion and recommended decision that support your position.

DFC/USPS-T39-73. Please refer to your response to DFC/USPS-T39-66 and explain the basis for your “understanding” that the POM provides guidelines, rather than requirements. Please cite any specific language or directives supporting your position.

DFC/USPS-T39-74. Please refer to your response to DFC/USPS-T39-66. Please quote the language in POM § 125.22 that would support a contention that customers who have a post-office box at a main post office should not expect mail delivery to post-office boxes on holidays if the box lobby is open on holidays.

DFC/USPS-T39-75. Please refer to your response to DFC/USPS-T39-68. Please provide all non-privileged documents that (1) explain the reasons for the decision not to amend DMM § D042.1.7 or (2) reveal the influence of the Commission’s opinion in Docket No. R97-1 on the decision not to amend DMM § D042.1.7.