

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 DOUGLAS F. CARLSON  
MOTION TO DESIGNATE MATERIAL FROM A PRIOR DOCKET  
(May 1, 2000)

The United States Postal Service hereby responds to the motion of Douglas F. Carlson to designate evidence from Docket No. R97-1. Mr. Carlson asks that portions of the interrogatory responses, rebuttal testimony, and oral cross-examination of the Postal Service's Docket No. R97-1 return receipt pricing witness (Mr. Plunkett) be designated as evidence in this proceeding. The interrogatory responses are intended to lay the foundation of Mr. Carlson's argument for a lower cost coverage for return receipt service by "establishing the special characteristics of return-receipt service that comprise the value of the service." Motion at 2. The rebuttal testimony "identifies specific locations [the IRS] where the Postal Service mishandles return-receipt mail." *Id.* The oral cross-examination is "necessary to rebut possible Postal Service arguments that the date of delivery of mail sent to the Internal Revenue Service is not important." *Id.*

If this material is designated into the record in this proceeding, then related testimony by Mr. Plunkett also should be so designated. Mr. Plunkett's rebuttal testimony addressed one of the interrogatory responses which Mr. Carlson seeks to designate (DFC/USPS-T40-1), and explained why possible inconsistencies between return receipt service and certain postal regulations, dissatisfaction with return receipt service by Mr. Carlson, and limited return receipt complaints do not support a lower cost

coverage for return receipt service. Tr. 32/17119, line 11 - 17121, line 13. This material is relevant to Mr. Carlson's plans to use Mr. Plunkett's testimony to support a lower return receipt cost coverage. Additional designations are also necessary to provide Mr. Plunkett's complete testimony about return receipt processing at IRS facilities. Tr. 32/17123, line 11 - 17125, line 4. Related oral cross-examination on procedures at IRS facilities should also be designated. Tr. 32/17170, line 15 - 17174, line 24.

Other portions of Mr. Plunkett's oral cross-examination should also be designated because they relate to which characteristics of return receipt service are important to the overall value of return receipt service. Tr. 32/17149, line 12 - 17161, line 19. This material is related to Mr. Carlson's plans to use Mr. Plunkett's testimony to establish what comprises the value of return receipt service, and is necessary to complete the record should Mr. Carlson's motion be granted.

Therefore, should Mr. Carlson's motion to designate witness Plunkett material be granted, the Postal Service moves for the counterdesignation of the following materials:

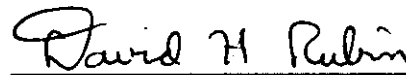
- Tr. 32/17119, line 11 - 17121, line 13,
- Tr. 32/17123, line 11 - 17125, line 4,
- Tr. 32/17149, line 12 - 17161, line 19,
- Tr. 32/17170, line 15 - 17174, line 24.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

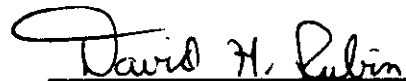
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



David H. Rubin  
David H. Rubin

**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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