

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-T39-69-75)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of Douglas F. Carlson: DFC/USPS-T39-69-75, filed on April 18, 2000.

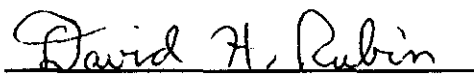
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



David H. Rubin

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May 2, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-T39-69-75)**

**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.

**RESPONSE:**

I recall speaking with a friend of mine who is a letter carrier in the Northern Virginia area about the revised return receipt form either during the late summer or fall of 1999. With respect to the revised return receipt form, my friend commented that it seemed carriers were filling out the address when different block more often than in the past when this was a service option and not part of the basic service as is currently the case. Field procedures are of general interest to me so I try to stay open to any information. I do not recall any other specific discussions with field personnel on this issue.

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**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).

**RESPONSE:**

- a. Confirmed.
- b. I am not aware of any documents or policies that corroborate my responses to the cited interrogatories, or require one box to be checked. I believe common sense applied to reading the question and instruction in box D would make it clear that a new written address should be entered if the address was different even if the "Yes" box is not checked.

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**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.

**RESPONSE:**

I will assume you are asking a follow-up to DFC/USPS-T39-62. Since my fee proposals for certified mail and return receipts were primarily cost driven, I have not developed the requested list of alternatives, other than what is in my testimony. I have addressed Criterion 5 for certified mail in my testimony at page 43 and I have addressed Criterion 5 indirectly for return receipt service on page 136 of my testimony. I presented alternatives to certified mail in LR-SSR-110 of Docket No. MC96-3. Also, please see my Docket No. MC96-3 testimony (USPS-T-8) at pages 66-67 and 72-73. Further, please see my Docket No. R97-1 testimony (USPS-T-39) at page 31.

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**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.

**RESPONSE:**

I do not have a belief as to whether the Commission is changing its emphasis on value of service.

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**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.

**RESPONSE:**

My understanding is derived from discussions with counsel and operations personnel. The POM provides general guidance, rather than requirements, on what internal procedures should normally apply to common operations. Management at many levels also commonly approves deviations from POM descriptions when local conditions warrant. The Postal Service is a large and complex organization that deals with individual local situations throughout the country. The POM provides guidance on how the processes should work, and it cannot possibly directly address every unique situation. Local postal management generally complies with the guidelines of the POM.

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**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.

**RESPONSE:**

My response to DFC/USPS-T39-66 does not make that contention. Even at main offices, mail might not be distributed if the office is not otherwise kept open to meet "reasonable customer requirements." Also see my response to DFC/USPS-T39-73.

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**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.

**RESPONSE:**

I am not aware of any documents that would explain the reasons for the decision not to amend the referenced DMM section or reveal the influence of the Commission's opinion on the decision not to amend the referenced DMM section.



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: May 2, 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.



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