

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 UNITED STATES POSTAL SERVICE  
WITNESS MAURA ROBINSON  
(DFC/USPS-T34-24-27)

May 8, 2000

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

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: May 8, 2000

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DOUGLAS F. CARLSON

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**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*.



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DOUGLAS F. CARLSON

May 8, 2000  
Emeryville, California

**DFC/USPS-T34-24.** Please refer to your response, filed on April 26, 2000, to the question posed during oral cross-examination at Tr. 7/2897.

- a. Please confirm that the service standard for mail sent from San Francisco to Los Angeles is two days for both Priority Mail and First-Class Mail.
- b. Please confirm that any IBM and NCR retail terminals installed in San Francisco will indicate that the service standard for mail from San Francisco to Los Angeles is three days for First-Class Mail and two days for Priority Mail.
- c. Please confirm that the service standard for mail sent from San Francisco to Seattle is two days for both Priority Mail and First-Class Mail.
- d. Please confirm that any IBM and NCR retail terminals installed in San Francisco will indicate that the service standard for mail from San Francisco to Seattle is three days for First-Class Mail and two days for Priority Mail.
- e. Please confirm that the service standard for mail sent from Washington, DC, to Boston is two days for both Priority Mail and First-Class Mail.
- f. Please confirm that any IBM and NCR retail terminals installed in Washington will indicate that the service standard for mail from Washington to Boston is three days for First-Class Mail and two days for Priority Mail.
- g. Please confirm that the information provided in (b), (d), and (f) may cause customers who would use First-Class Mail to send a one-ounce letter if they knew that the service standard was two days to use Priority Mail in the mistaken belief that Priority Mail would provide a faster service standard than First-Class Mail. If you do not confirm, please explain and provide all facts and information that support your answer.

**DFC/USPS-T34-25.** Please refer to your response, filed on April 26, 2000, to the question posed during oral cross-examination at Tr. 7/2897. Please provide an estimate of the date on which NCR and IBM retail terminals will be programmed to provide correct service-standard information for First-Class Mail.

**DFC/USPS-T34-26.** Please refer to your response, filed on April 26, 2000, to the question posed during oral cross-examination at Tr. 7/2897. Please explain why the NCR and IBM retail terminals do not indicate a one-day service commitment for Priority Mail between destinations for which the service standard is one day.

**DFC/USPS-T34-27.** Please refer to your response, filed on April 26, 2000, to the question posed during oral cross-examination at Tr. 7/2897. Suppose a customer is seeking to mail a one-ounce letter from Washington, DC, to Baltimore, Maryland.

- a. Please confirm that the service standard for First-Class Mail and Priority Mail from Washington to Baltimore is one day.
- b. Please confirm that an NCR retail terminal installed in Washington will indicate to this customer that Priority Mail should provide delivery in two days and First-Class Mail should provide delivery in three days.
- c. Please confirm that the information provided in (c) might cause a customer to believe that Express Mail would be the only service for which a service standard for this letter would provide delivery in one day. If you do not confirm, please provide all facts and information that support your answer.