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
INTERROGATORIES TO
ASSOCIATION OF PRIORITY MAIL USERS, INC.
WITNESS JOHN HALDI
(DFC/APMU-T1-1-2)

June 3, 2000

Pursuant to Rules 25–27, I hereby submit interrogatories to Association of Priority Mail Users, Inc. witness John Haldi.

The instructions contained in my interrogatories to Postal Service witness Mayo (DFC/USPS-T39-1–9) are incorporated herein by reference.

Respectfully submitted,

Dated: June 3, 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

June 3, 2000 Emeryville, California **DFC/APMU-T1-1**. Please refer to your testimony at page 26, line 17 to page 27, line 12.

- a. Please identify the cities in which you have observed that collection times for "competitors' collection boxes in commercial areas of major cities typically range between 7:00 and 8:00 p.m."
- b. Please confirm that the final collection times of FedEx and UPS collection boxes in West Coast cities such as San Francisco, Oakland, Los Angeles, and Seattle typically are not later than 5:00 PM or 5:30 PM. If you do not confirm, please explain.
- c. Please identify cities on the West Coast in which Postal Service competitors have collection boxes with final collection times typically ranging between 7:00 PM and 8:00 PM.

DFC/APMU-T1-2.

- a. Please confirm that the Web sites of FedEx and UPS, using a module that allows searches by address, city, or ZIP Code, provide locations and collection times of collection boxes, a map of collection-box locations, the distance from an address to particular collection boxes, and maps that allow customers to scroll in any direction to locate, on the map, other collection boxes. If you do not confirm, please explain.
- b. Please confirm that the UPS Web site also provides directions to collection boxes.
- c. Please confirm that the Postal Service Web site does not provide any of the information in (a) or (b) concerning locations of collection boxes where customers may deposit First-Class Mail or Priority Mail. If you do not confirm, please explain.
- d. Please confirm that absence of information on locations of collection boxes from the Postal Service Web site lowers the value of Priority Mail service compared both to this aspect of the value of competitors' services and to the value of Priority Mail service if collection-box information were available on the Postal Service Web site. If you do not confirm, please explain.