

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY.

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS ROBINSON TO CARLSON INTERROGATORIES  
(DFC/USPS-T34-24-26)

Pursuant to Presiding Officer's Ruling No. R2000-1 (June 13, 2000), the United States Postal Service hereby provides the response of witness Robinson to the following interrogatories of Douglas F. Carlson: DFC/USPS-T34-24-26, filed on May 10, 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

  
Richard T. Cooper

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June 14, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO INTERROGATORIES OF DOUGLAS F. CARLSON

**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.

**Per Ruling POR R2000-1/79:** "the Postal Service need not answer subparts (b), (d) and (f) regarding NCR terminals."

**RESPONSE:**

- a. Confirmed that the service standards for both Priority Mail and First-Class Mail originating in San Francisco (ZIP Codes 940-941) and destinating in Los Angeles (ZIP Codes 900-901) are two days.
- b. I am informed that no IBM retail terminals are installed in San Francisco.

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- c. Confirmed that the service standards for both Priority Mail and First-Class Mail originating in San Francisco (ZIP Codes 940-941) and destinating in Seattle (ZIP Codes 980-981) are two days.
- d. I am informed that no IBM retail terminals are installed in San Francisco.
- e. Confirmed that the service standards for both Priority Mail and First-Class Mail originating in Washington, DC (ZIP Codes 200, 202-205) and destinating in Boston MA (ZIP Codes 021-022) are two days.
- f. I am informed that no IBM retail terminals are installed in Washington, DC.
- g. Confirmed that it is possible that some customer, based solely on the service standard information displayed on the retail terminal screen, may choose to send a one-ounce letter using Priority Mail rather than First-Class Mail.

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**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.

**RESPONSE:**

It is my understanding that there is no scheduled date for completion of this programming of the NCR and IBM retail terminals.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**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.

**RESPONSE:**

It is my understanding that the office responsible for retail terminal programming was not aware until April 2000 that one-day Priority Mail service standards existed between any three-digit ZIP Code pairs.

**DECLARATION**

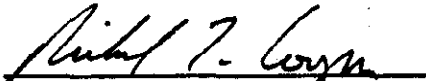
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Maura Robinson  
MAURA ROBINSON

Dated: 6.14.2002

**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.

  
Richard T. Cooper

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