

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, 2001

Docket No. R2001-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. MAYO
(DFC/USPS-T36-1-4)

September 28, 2001

Pursuant to sections 25-27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Susan W. Mayo.

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.

The instructions contained in my interrogatories DFC/USPS-1-13 are incorporated herein by reference.

Respectfully submitted,

Dated: September 28, 2001



DOUGLAS F. CARLSON

DFC/USPS-T36-1. Please provide all facts, information, and documents of which you or the Postal Service are aware that describe problems with the quality of certified mail service. This interrogatory specifically includes problems with delivery of certified mail to large-volume recipients. This interrogatory also specifically includes responsive media reports of which the Postal Service is aware. Documents dated prior to January 1, 1996, do not need to be produced.

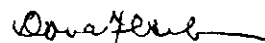
DFC/USPS-T36-2. Please refer to your testimony at page 56, lines 4–5. Please provide all facts, information, and documents that support your statement that “concerns about unreliable service” for return-receipt service “imply a lower cost coverage.” Documents dated prior to January 1, 1996, do not need to be produced.

DFC/USPS-T36-3. Please refer to your testimony at pages 29–30, where you discuss the proposed classification changes for certified mail. Suppose the Commission recommends your proposed classification changes, but with one addition: the Postal Service also will make available to customers a copy of the signature of the person or entity that accepted delivery of the item. Please explain all reasons why the Postal Service would or would not support this recommendation from the Commission.

DFC/USPS-T36-4. Please confirm that the proposed change to DMCS § 945.11, which you discuss in your testimony at page 59, suggests that the electronic return receipt *will* provide the address of delivery, if it is different from the address on the mail piece, while your testimony at page 57–58 states that electronic return receipts will *not* provide the address information.

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

September 28, 2001
Santa Cruz, California