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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T26-1-3)

The United States Postal Service hereby provides the responses of witness Nieto to the following interrogatories of Douglas F. Carlson: DFC/USPS-T26-1 to 3, filed on October 1, 2001.

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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2986; Fax –6187 October 15, 2001

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T26-1. Please refer to your testimony at pages 12–13. Please confirm that Postal Service data systems already contain a digital or other electronic image of the signature of the person or entity that accepted delivery of certified and registered articles. If you do not confirm, please explain.

Response to DFC/USPS-T26-1. Confirmed.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T26-2. Please refer to your testimony at pages 12–13. Assume that the Commission recommends and the Postal Service implements the service enhancements to certified mail and registered mail that the Postal Service has proposed in this proceeding. Please confirm that the Postal Service has the technological capability to make available to customers a copy of the signature of the person or entity that accepted delivery of certified and registered articles. If you do not confirm, please explain.

Response to DFC/USPS-T26-2. Not confirmed. The Postal Service does not have the technological capability to provide signatures over the Internet, without the risk of infringement on its customers' privacy or security. All recipient signature images are provided by fax, mail or, as proposed for the electronic return receipt, by secure email.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES OF DOUGLAS F. CARLSON

DFC/USPS-T26-3. Please refer to your testimony at pages 12–13. Assume that the Commission recommends and the Postal Service implements the service enhancements to certified mail and registered mail that the Postal Service has proposed in this proceeding. Please identify and explain the types of costs, if any, that the Postal Service would incur if the Commission recommended and the Postal Service implemented an additional service enhancement that provided, to customers using the Internet, access to a copy of the signature of the person or entity that accepted delivery of certified and registered articles.

Response to DFC/USPS-T26-3. As described above, the Postal Service is not able to provide a secure method of presenting the signature over the Internet. We have not conducted any cost studies regarding the development of that capability. However, these costs may include additional servers, programming costs, and the costs of processing applications to secure a Personal Identification Number (PIN) for accessing the signature.

DECLARATION

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

Datade

) ctober 15, 2001

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.

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 October 15, 2001