

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, 1997

Docket No. R97-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT
(DFC/USPS-T40-1-6)

August 4, 1997

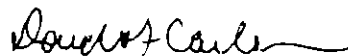
Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Michael K. Plunkett.

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 to witness Frank (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: August 4, 1997



DOUGLAS F. CARLSON

DFC/USPS-T40-1. Please refer to your testimony at page 12, lines 2-6. Please assume that a customer wishes to obtain proof of delivery of a letter. This customer decides that he has two choices:

1. Purchase return-receipt service from the Postal Service;

2. Not purchase return-receipt service, but instead enclose a self-addressed, stamped post card inside the letter. The post card would request that the recipient sign the post card, indicate on the post card the date on which the letter was delivered, and either indicate that the letter was delivered to the address on the mail piece or provide the address at which the letter was delivered if that address differed from the address on the letter. The self-addressed post card would request that the recipient mail back the post card promptly.

a. Please confirm that a customer might be faced with these two choices.

b. Please confirm that option (1) and option (2) would provide the customer with the same amount and reliability of information about the delivery of the letter. If you do not confirm, please explain your answer fully.

c. For the purpose of assisting the Commission in determining the value of return-receipt service, please explain all differences between option (1) and option (2) that might make option (1) more valuable than option (2).

DFC/USPS-T40-2. Please provide all evidence that the Postal Service has to indicate the percentage of customers who would consider a return receipt showing to whom a mail piece was delivered, the date of delivery, and the address of delivery to be at least 35 cents more valuable than a return receipt showing to whom a mail piece was delivered and the date of delivery.

DFC/USPS-T40-3. Please provide all evidence that the Postal Service has to indicate the percentage of customers who would *not* consider a return receipt showing to whom a mail piece was delivered, the date of delivery, and the address of delivery to be at least 35 cents more valuable than a return receipt showing to whom a mail piece was delivered and the date of delivery.

DFC/USPS-T40-4. Please provide all evidence that the Postal Service has to indicate the percentage of customers to whom the address information on a return receipt is of any positive value.

DFC/USPS-T40-5. Referring to the Docket No. MC96-3 record if necessary, please provide all evidence or data that the Postal Service has to estimate the cost associated with providing:

a. The new address on a return receipt if a piece of mail is delivered to an address different from the one on the mail piece;

b. A check mark in the check-off box to indicate that the piece of mail was delivered to the address on the mail piece.

DFC/USPS-T40-6 Referring to the Docket No. MC96-3 record if necessary, please provide the approximate percentage of all return receipts that will be delivered at an address different from the address on the mail piece.

DFC/USPS-T40-7. Please refer to your testimony regarding the proposed new delivery-confirmation service.

a. Please provide all standards relating to the time that should be allowed to elapse between (1) the time that a parcel for which a customer has purchased delivery confirmation was delivered and (2) the time at which the telephone- or Internet-based delivery-confirmation system will reflect the delivery data.

b. Will a customer be eligible for a refund if the delivery-confirmation data are not posted to the delivery-confirmation system within a specified period of time after delivery of the parcel? If not, why not?

c. Please provide all data that are available about the speed with which delivery-confirmation data become available to customers who access the existing Express Mail tracking system.

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* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

August 4, 1997
Emeryville, California