

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 SUSAN W. NEEDHAM  
(DFC/USPS-T39-1-4)

August 4, 1997

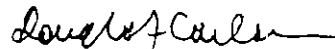
Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Susan W. Needham.

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 Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: August 4, 1997



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DOUGLAS F. CARLSON

**DFC/USPS-T39-1.** Please refer to your testimony at page 59. For Group A, B, C, and D post-office boxes, please provide a table similar to the one on page 59 that shows the cost coverage for each group and size at (1) the current fee and (2) the proposed fee.

**DFC/USPS-T39-2.** Please refer to your testimony at page 60, lines 4-5. Does the term "carrier delivery" include delivery by a rural carrier?

**DFC/USPS-T39-3.** Please confirm that DMM section S911.2.1 requires the mailer, in accordance with the chart contained in that section, to declare the full value of a registered article when the mailer presents it for registration and mailing.

**DFC/USPS-T39-4.** Please refer to your testimony at page 78, lines 4-5, where you testified that "a value level of \$0.00 indicates there is no need for insurance." Please explain why there is a need for a customer to purchase postal insurance if (1) the customer wishes to send a \$1,000 diamond ring via registered mail and (2) the mailer's own, private insurance would reimburse him for loss of the ring.

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### 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*.



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DOUGLAS F. CARLSON

August 4, 1997  
Emeryville, California