

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-T40-7-15)

August 25, 1997

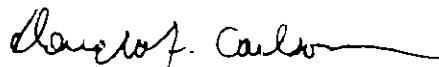
Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Michael K. Plunkett.

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

Respectfully submitted,

Dated: August 25, 1997



DOUGLAS F. CARLSON

DFC/USPS-T40-7. Please explain the rationale for DMM section § S915.1.2, which restricts the availability of return-receipt service to Express Mail and mail sent certified, COD, insured for more than \$50, or registered.

DFC/USPS-T40-8. Please explain the rationale for requiring a person who, at the time of mailing, desires only a return receipt showing proof of delivery of a First-Class letter to purchase either certified mail, which provides proof of mailing and a record of delivery at the delivery post office, or another of the special services listed in DMM § S915.1.2.

DFC/USPS-T40-9. Please provide the cost of each element or activity related to return receipt for merchandise (I am seeking information that is similar to the information that you provided in Attachment to DFC/USPS-T40-5).

DFC/USPS-T40-10. Please refer to DMM § S912.1.1, which describes certified mail, and DMM § S917.1.1, which describes return receipt for merchandise. For the purpose of this question, please focus on only these two DMM sections. Please confirm that every substantive element, aspect, or characteristic of the description of certified mail also appears in the description of return receipt for merchandise. If you do not confirm, please explain which elements, aspects, or characteristics of certified mail are not shared by return receipt for merchandise.

DFC/USPS-T40-11. Please refer to DMM § S912.2.1 and DMM § S917.2.1. Why may a mailer of certified mail deposit articles in collection boxes (thus exercising his DMM § S912.2.5(d) option to forgo proof of mailing) while a mailer using return receipt for merchandise cannot deposit articles in street collection boxes? (Assume that these articles are metered.) Please explain the rationale for these differing requirements.

DFC/USPS-T40-12.

a. Please refer to DMM § S912.2.5(b), which requires a user of certified mail, return receipt requested, to place a complete return address on the mail piece. Please explain the rationale for this requirement.

b. Please refer to DMM § S912.2.5(b), which applies to certified mail, return receipt requested. This section states, in part, that "The name and delivery address entered on the reverse of the return receipt do not have to match the sender's name and return address on the mailpiece." Please refer also to DMM § S917.2.2(c), which applies to return receipt for merchandise. This section states, in part, that "The name of the person to whom the return receipt is to be returned must be the same as that of the sender." Please explain the rationale for these different requirements.

DFC/USPS-T40-13. Please refer to DMM § S917.2.3(f). For which situation is the cost of providing return receipt for merchandise service lower: (1) A customer is not home, but the sender signed the waiver on Form 3804, so the delivery employee signs for the article on the first delivery attempt; or (2) A customer is not home and the sender did not sign the waiver on Form 3804, so the Postal Service must make another delivery attempt or hold the article for pickup at the post office. Please explain your answer in detail and quantify cost information.

DFC/USPS-T40-14.

a. Please provide the percentage of articles sent via return receipt for merchandise for which the sender signed the waiver on Form 3804.

b. Please provide the percentage of articles sent via return receipt for merchandise for which the delivery employee signed for the article on the first delivery attempt because the addressee or his agent was not available to accept the shipment. (Assume that the sender signed the waiver on Form 3804.)

DFC/USPS-T40-15. Please refer to your response to DFC/USPS-T40-1.

a. Would it be reasonable to conclude that, in a significant number of the instances in which a sender elects to use return receipt, the relationship between sender and recipient is something less than cordial or that the recipient may benefit from the provision of faulty information about date of delivery? If not, please explain.

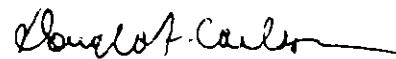
b. At least in those instances in which the recipient may benefit from provision of faulty information about the existence or date of delivery, does the fact that the Postal Service retains possession of the mail piece until the recipient signs the Form 3811 return receipt contribute significant value to return-receipt service? If not, please explain.

c. At least in those instances in which the recipient may benefit from provision of faulty information about the existence or date of delivery, does the fact that the Postal Service acts as a disinterested third party in confirming the date on which an article was delivered and the address of delivery contribute significant value to return-receipt service? If not, please explain.

d. Please confirm that the Postal Service either places the date of delivery on the Form 3811 return receipt or, if the recipient has already placed the date of delivery on the Form 3811, verifies the accuracy of the date of delivery. If you confirm, does this practice contribute significant value to return-receipt service? Please explain.

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 25, 1997
Emeryville, California