

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-T28-7 AND 8)

The United States Postal Service hereby provides the responses of witness {name} to the following interrogatories of Douglas Carlson: DFC/USPS-T28-7 and 8, filed on October 30, 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

Michael T. Tidwell

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Washington, D.C. 20260-1137
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November 9, 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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 9, 2001

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF DOUGLAS CARLSON**

DFC/USPS-T28-7. Please refer to your response to DFC/USPS-T28-1. Please provide details and all documents related to your statement that “I am aware that in some instances, collection times for First-Class Mail have been adjusted.”

RESPONSE:

My statement was simply based on my general understanding that collection times are sometimes adjusted

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DFC/USPS-T28-8. Please refer to your response to DFC/USPS-T28-1. Please explain how posted collection times may not reflect “absolute changes in service for a particular location” but rather may be designed “to provide more meaningful collection times to meet service standards.” In your response, please specify whether your statement applies to instances of collection times being shifted to earlier hours and, if so, how your statement applies these changes.

RESPONSE:

My statement was acknowledging the possibility that a posted collection time may be changed in order to give the consumer better information. If, for example, it was determined that a posted 5:00pm collection was too late to get the mail to the plant for processing and have it delivered the next day in the overnight service area, it would be more “meaningful” to post an earlier collection time, say 4:00pm, as the final collection of the day. If the mail deposited from 4:00pm to 5:00pm is unlikely to get overnight service, it is better that the consumer know that when she deposits the mail in the collection box.