

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

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POSTAL RATE AND FEE CHANGES, 2001)

POSTAL RATE COMMISSION
Docket No. R2001-14

AMAZON.COM, INC.
FIRST FOLLOW-UP INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS LINDA A. KINGSLEY (AMZ/USPS-T39-10-12)
(December 12, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Amazon.com, Inc. hereby submits follow-up interrogatories and requests for production of documents. If necessary, please redirect any interrogatories and/or requests to a more appropriate Postal Service witness.

Respectfully submitted,




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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


John S. Miles

December 12, 2001

AMZ/USPS-T39-10.

Please refer to your responses to AMZ/USPS-T36-4(h) and AMZ/USPS-T36-6(b), redirected to you from witness Mayo, where you refer to the “significant” magnitude of additional training for carriers and “increased costs” due to the fact that retention of the current level of service “would greatly hinder carrier casing productivity if the carrier had to identify a DC flat and then ‘isolate’ it somehow to ensure it was scanned on the street (*e.g.*, put it as the first piece for delivery)” (response to AMZ/USPS-T36-6(b)).

- a. Please confirm that carriers (and Post Office box clerks) currently handle and deliver all Delivery Confirmation mail, regardless of whether such items are received as a part of the Standard Mail, Package Services, or Priority Mail mail-streams. If you do not confirm, please explain all exceptions.
- b. Please confirm that all delivery employees are trained to recognize Delivery Confirmation mail pieces and are aware of the processes for handling and delivery of such mail pieces. If you do not confirm, please explain how delivery employees recognize, handle, and deliver such pieces.
- c. How are Package Services Delivery Confirmation mail pieces that are handled in the flats mail-stream currently treated? Please provide a description of the process that the delivering employee would follow to “isolate” a Delivery Confirmation mail piece during in-office handling to ensure that it was properly scanned at the time of delivery.
- d. If your response to preceding part b is affirmative, please explain why you believe that “significant” training would be required to educate delivery

personnel regarding procedures with which they are already familiar and which they are already applying.

AMZ/USPS-T39-11.

Please refer to your response to AMZ/USPS-T36-6(b), redirected from witness Mayo.

- a. Please estimate the increased cost to the Postal Service to provide the “significant” training that you describe in your response.
- b. Please provide an estimate of the impact on carrier casing productivity caused “if the carrier had to identify a DC flat and then ‘isolate’ it somehow....”
- c. Please confirm that, under current practice, carriers are required to “finger” mail prior to delivery, thus ensuring that the articles to be delivered are in fact addressed to the delivery point that is to be serviced. If you do not confirm, please explain how carriers assure that they are delivering the correct items to recipients.
- d. Please confirm that enveloped flats are now looked at by carriers to see if special services, such as certified mail return receipt requested, are required. If your response is negative, how do carriers determine whether special services are required?
- e. If your response to preceding part c is affirmative, is it not likely that carriers would recognize a Delivery Confirmation mail piece while performing this process, thus allowing the item to be scanned on the street?

- f. If, in your response to preceding part e, you contend that it is **not** likely that a carrier on the street would recognize a Delivery Confirmation mail piece, thus allowing it to be properly scanned, please provide a thorough rationale that you believe supports your contention.

AMZ/USPS-T39-12.

Please refer to your response to AMZ/USPS-T36-6(b), redirected from witness Mayo, where you state that “[u]nlike certified mail, Delivery Confirmation labels are often printed by the sender, with no requirement for any special ‘tagging’ or fluorescence. It is my understanding that requiring special label taggants would discourage many of our existing customers from using our products, and would make us less competitive.”

- a. Please cite all sources that support your contention that a requirement to use such methods as tagging or fluorescence would discourage current Postal Service customers from using your products.
- b. Has the Postal Service performed any market research that would support this contention?
- c. If your answer to preceding part b above is anything other than an unqualified negative, please cite the studies, identify specifically all relevant data that support your contention, and provide copies of such studies as library references.