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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT
(DFC/USPS-T40-16-22)

September 15, 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: September 15, 1997



DOUGLAS F. CARLSON

DFC/USPS-T40-16.

a. Do any instances exist in which the Postal Service, pursuant to a written or unwritten agreement, understanding, or procedure, regularly or routinely delivers to any private company, individual, or government agency other than the Postal Service letters, flats, or parcels with the Forms 3811, Domestic Return Receipt, still attached and allows the recipient, at a later time and not under the visual supervision of a postal employee, to sign the Forms 3811, indicate the date of receipt on the Forms 3811, and then return the Forms 3811 to the Postal Service for return to the sender?

b. If your answer to part (a) is yes, please explain fully, cite all known examples, and reconcile your response with applicable postal regulations.

DFC/USPS-T40-17.

a. Do any instances exist in which the Postal Service, pursuant to a written or unwritten agreement, understanding, or procedure, regularly or routinely (1) delivers letters, flats, or parcels to any private company, individual, or government agency other than the Postal Service, (2) removes the Forms 3811, Domestic Return Receipt, prior to or simultaneously with delivery, and then (3) allows the recipient, at a later time and not under the visual supervision of a postal employee, to sign the Forms 3811, indicate the date of receipt on the Forms 3811, and then return the Forms 3811 to the Postal Service for return to the sender?

b. If your answer to part (a) is yes, please explain fully, cite all known examples, and reconcile your response with applicable postal regulations.

DFC/USPS-T40-18.

a. Do any instances exist in which the Postal Service, pursuant to a written or unwritten agreement, understanding, or procedure, regularly or routinely delivers letters, flats, or parcels to any private company, individual, or government agency other than the Postal Service, with the Forms 3811, Domestic Return Receipt, either still attached to or already removed from the letters, flats, or parcels, and then allows the recipient to sign the Forms 3811 under conditions that prevent the Forms 3811 from being under the visual supervision of a postal employee while the recipient is signing them?

b. If your answer to part (a) is yes, please explain fully, cite all known examples, and reconcile your response with applicable postal regulations.

DFC/USPS-T40-19.

a. Please confirm that POM § 822.112 provides that return receipts must be mailed not later than the first workday after delivery. If you do not confirm, please explain.

b. Please confirm that the POM § 822.112 requirement described in part (a) adds value to return-receipt service. If you do not confirm, please explain.

c. Please refer to the two options presented in the introductory portion of DFC/USPS-T40-1 and confirm that the POM § 822.112 requirement described in part (a) tends to make option (1) more valuable to many mailers than option (2). If you do not confirm, please explain.

DFC/USPS-T40-20.

a. Please refer to your response to DFC/USPS-T40-8 and confirm that the cost of creating a delivery record for return receipt for merchandise is not attributed to a special service that is listed in DMM § S915.1.2. If you do not confirm, please explain fully and, if applicable, explain why costs for return receipt for merchandise would be attributed to a special service listed in DMM § S915.1.2, given that return receipt for merchandise can be purchased independently of any other special service.

b. Please confirm that all costs for return receipt for merchandise, including the cost of creating a delivery record at the delivery post office, are attributed exclusively to return receipt for merchandise. If you do not confirm, please explain.

DFC/USPS-T40-21.

a. Will delivery-confirmation service provide proof of mailing? Please explain.

b. When a customer who purchases manual delivery-confirmation service leaves the window, will he have a dated receipt proving that he mailed the item on a particular date?

c. Will delivery confirmation provide a record of delivery at the delivery post office that is similar to the record of delivery that is created for certified mail or return receipt for merchandise?

DFC/USPS-T40-22.

a. Please confirm that, under the Postal Service's proposal in Docket No. R97-1, a customer who sends a piece of mail via Priority Mail will have the option of purchasing manual delivery confirmation for \$0.35 as well as a return receipt for the proposed return-receipt fee of \$1.45. If you do not confirm, please explain.

b. Suppose a mailer desires only a return receipt showing to whom the mail piece was delivered, the date of delivery, and the address of delivery (if the address is different from the address on the mail piece). This mailer also desires only whatever proof of mailing that the delivery-confirmation service may or may not provide. Please confirm that a mailer who desires only the information described in this question will be able to obtain that information for \$1.80 if he sends his mail via Priority Mail (using delivery confirmation and return receipt) but will be required to pay \$3.00 to obtain this information if he sends his letter via First-Class Mail (since he will need to purchase

certified mail and return receipt). Please explain your answer. (Note that this mailer places no value on the proof of mailing that certified mail provides.)

c. If you confirm in part (b), please explain why a customer who uses First-Class Mail should be required to pay \$1.20 more than if he used Priority Mail, just to obtain the same information.

d. Please explain why a customer who uses Priority Mail should have the option to forgo the services of certified mail and directly obtain delivery confirmation and a return receipt, while a customer who uses First-Class Mail must pay for the more-expensive certified mail even if he does not want to purchase certified mail.

e. Please explain why the proposed delivery-confirmation service should not be offered for customers who wish to use First-Class Mail and return receipt.

f. Please explain why a service that is identical in function to return receipt for merchandise should not be available for non-merchandise that is sent via First-Class Mail.

g. Please explain why the Postal Service would support or oppose a proposal to offer a new service called "Return Receipt Service" that would provide the same services as return receipt for merchandise and would be available for all First-Class Mail. In your answer, consider that this service might or might not be offered in conjunction with delivery-confirmation service.

h. Please explain why the services described in parts (e), (f), and (g), if they were available, would not provide a valuable service to customers.

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

September 15, 1997
Emeryville, California