

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF POSTAL SERVICE WITNESS BERNSTEIN  
TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-T8-9-10)  
(June 27, 2005)

The United States Postal Service hereby provides the response of witness Bernstein to the following interrogatories of Douglas Carlson: DFC/USPS-T8-9-10, filed on June 20, 2005.

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

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Eric P. Koetting

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June 27, 2005

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TO INTERROGATORIES FROM DOUGLAS F. CARLSON

**DFC/USPS-T8-9.** Please refer to your response to DFC/USPS-T8-8. When you prepared your testimony, did you believe that the Postal Service encouraged or required retail window clerks to encourage customers to purchase Priority Mail or Express Mail instead of First-Class Mail or Package Services? Please explain.

**RESPONSE:**

That was not my belief. To the extent that it may be true, any effect that it might have had on the volumes of the above mail products would be reflected in the base volumes of these products and would therefore be incorporated into the Test Year volume forecasts.

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**DFC/USPS-T8-10.** Please refer to your response to DFC/USPS-T8-8. When you prepared your testimony, did you believe that retail window clerks were required to meet sales quotas or similar sales objectives for Priority Mail or Express Mail? Please explain.

**RESPONSE:**

As I stated in my response to DFC/USPS-T8-8, “I am not aware of any Postal Service “policy” as described in your question.” As I stated in my response to DFC/USPS-T8-9, to the extent that such a policy existed, and to the extent that it has had any impacts on mail volumes, any effects are part of the myriad influences on mail volumes that are reflected in the base year volumes used in the Test Year volume forecasts.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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