

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. BERKELEY (DFC/USPS-T39-1-11)**

May 23, 2006

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Susan W. Berkeley.

The instructions accompanying DFC/USPS-T34-1–4 are incorporated herein by reference.

Respectfully submitted,

Dated: May 23, 2006

DOUGLAS F. CARLSON

DFC/USPS-T39-1. Please provide all instances known to the Postal Service of a legal requirement that causes customers to purchase green Form 3811 return receipts instead of electronic return receipts.

DFC/USPS-T39-2. Please discuss the value of service, relative to each other, of Form 3811 return receipts and electronic return receipts.

DFC/USPS-T39-3. Please discuss the automated processes, if any, by which the Postal Service separates certified mail from the regular mail stream.

DFC/USPS-T39-4. Please refer to your testimony at page 25, lines 12–14, where you state that “Delivery Confirmation does not have a signature feature, and Signature Confirmation does not provide access to a pen and ink signature.” Does certified mail provide access to a “pen and ink” signature? Please explain.

DFC/USPS-T39-5. Please refer to the Commission’s Opinion and Recommended Decision in Docket No. R2005-1 at 184–85 and explain the findings of the Postal Service’s consideration, if any, of my proposal to combine certified mail and electronic return receipt into one service.

DFC/USPS-T39-6. Please explain how individual Postal Service customers, as distinguished from institutional or corporate customers, can obtain the electronic rate for Delivery Confirmation for First-Class parcels.

DFC/USPS-T39-7. Please refer to your testimony at page 35, lines 10–12. Please explain how your calculation results in a proposed fee of 75 cents for manual Delivery Confirmation for First-Class parcels.

DFC/USPS-T39-8. Please provide the percentage of items sent with restricted delivery that are refused or returned to the sender unclaimed.

DFC/USPS-T39-9. Please refer to your testimony at page 63, lines 13–17 and explain how you arrived at the 94-percent markup for the fee for electronic return receipt and the 46-percent markup for the fee for basic return receipt.

DFC/USPS-T39-10. Please refer to your testimony at page 67, lines 5–7.

- a. Please explain why a person would purchase Signature Confirmation instead of Delivery Confirmation if he/she did not desire access to the recipient's signature image by fax or mail.
- b. Would your sentence be accurate if it read, "Signature Confirmation provides electronic Delivery Confirmation data (date and time of delivery or attempted delivery) and access to the recipient's signature image by fax or mail"?

DFC/USPS-T39-11. Please refer to your testimony at page 77, lines 3–14.

- a. Please confirm that the Postal Service sells #6³/₄, #9, and #10 stamped envelopes.
- b. Please confirm that the length of a #6³/₄ stamped envelope is not 6³/₄ inches, the length of a #9 stamped envelope is not 9 inches, and the length of a #10 stamped envelope is not 10 inches.