

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS
SUSAN W. BERKELEY (USPS-T-34) TO INTERROGATORIES
OF DOUGLAS F. CARLSON (DFC/USPS-T34-1-4)
(June 6, 2006)

The United States Postal Service hereby provides the responses of witness Susan W. Berkeley (USPS-T-34) to interrogatories DFC/USPS-T34-1-4, filed on May 23, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T34-1. Please provide a citation to the DMM or DMCS to support your statement on page 3, lines 4–6 that Express Mail provides “guaranteed” delivery.

RESPONSE:

Please see DMCS § 180.

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DFC/USPS-T34-2. Please refer to your testimony on page 4, lines 7–9. Please confirm that several days may pass after a customer mails an Express Mail item before the customer receives a receipt showing the time and date of mailing and specifying the date and time of the delivery commitment. If you do not confirm, please explain.

RESPONSE:

Depending upon the method of entering the Express Mail piece into the mailstream, confirmed that several days may pass before a customer receives the Express Mail receipt if the receipt has to be mailed.

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DFC/USPS-T34-3. For Express Mail deposited in Express Mail collection boxes, please confirm that the acceptance time indicated in the Postal Service's electronic Track & Confirm system may differ, by more than a few minutes, from the acceptance time written on the Express Mail receipt. If you do not confirm, please explain.

RESPONSE:

Confirmed that the acceptance time on the Postal Service's tracking system may vary by more than a few minutes from the acceptance time noted in writing on the receipt; however, I would be surprised if the time variance exceeded, say, 10 to 15 minutes.

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DFC/USPS-T34-4. Please refer to your testimony on page 8, lines 7–9.

- (a) Please provide a citation from the DMM or DMCS to support your statement that Next Day Post Office to Addressee service provides “guaranteed next day delivery[.]”
- (b) Do you agree that the only guarantee is for a refund of postage if delivery is not achieved by the promised date and time? If not, please explain.

RESPONSE:

- a) Please see DMM Sections 113.4.2.1 and 113.4.2.6.
- b) Not necessarily. Along with the refund of postage, the guarantee also applies to merchandise insurance and document reconstruction up to \$100, if applicable, which are basic features of Express Mail service.