

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF POSTAL SERVICE WITNESS BERKELEY  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-T39-1-2, 4-11)

The United States Postal Service hereby files the responses of Witness Berkeley to the above listed interrogatories, filed on May 23, 2006. Interrogatory DFC/USPS-T39-3 has been redirected to witness McCrery.

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  
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-1-11)**

**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.

**RESPONSE:**

Postal Service Headquarters does not collect information on legal requirements that cause customers to purchase green card Form 3811 return receipts instead of electronic return receipts.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-1-11)**

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

**RESPONSE:**

All return receipts (Form 3804, Form 3811, electronic, and delivery record after mailing) provide high values of service individually and overall as a special service. The intrinsic high value of the Form 3811 return receipt is directly related to both the capture of the original signature and the provision of this signature. The capture of the signature could be of a high value to the mailpiece recipient, as well as always being a high value to the purchaser of the return receipt service. The physical green card receipt with the original signature would always be of a high value to the return receipt purchaser. The intrinsic high value to the electronic return receipt, in addition to the delivery record information provided by the green card, is the quicker access to this information and access to this information on-line at any time right after the delivery takes place. In these high technology times, an electronic format for delivery records is undoubtedly a higher value to customers than green card records, for storing and organization purposes.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
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**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.

**RESPONSE:**

When a green card return receipt (Form 3811) is attached to a piece of certified mail, the certified mail customer will receive a “pen and ink” signature. Since 9 out of 10 certified mail articles have return receipts attached (most of these are green cards), it is safe to say that the majority of certified mail provides access to a “pen and ink” signature. In order to have a “pen and ink” signature using either Delivery Confirmation or Signature Confirmation, an applicable host special service would have to be purchased along with the return receipt.

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**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.

**RESPONSE:**

The Postal Service has not yet studied combining certified mail service with electronic return receipts. As a result of the certified mail enhancement proposed in Docket No. R2001-1, delivery data are available with certified mail. This enhancement could negate the need to add return receipt service for certain certified mail customers, including those customers not requiring a signature. Therefore, for the time being, the Postal Service is keeping return receipts as a separate option for certified mail customers.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
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**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.

**RESPONSE:**

Several companies provide the vehicle for individuals to mail First-Class Mail parcels using electronic Delivery Confirmation service. The companies I am aware of which provide access to electronic manifest capability are eBay, Stamps.Com, Endicia and Pitney Bowes.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
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**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.

**RESPONSE:**

The cost was marked up by 7 percent and the current fee of \$0.60 is proposed to increase by 25 percent. The testimony states that the cost was marked up by 25 percent and should state 7 percent. On a related note, the testimony should also state that the electronic fee for First-Class Mail parcels, Standard Mail, and Package Services was developed by marking up the cost by 21 percent, not 29 percent. Further, the testimony should also state that the retail fee for Priority Mail was developed by marking up the cost by 17 percent, not 30 percent. Errata will be filed shortly to correct these mistakes.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-1-11)**

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

**RESPONSE:**

The Postal Service does not collect this type of information.

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**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.

**RESPONSE:**

Please see my testimony at page 64, line 4, through page 65, line 9, where I discuss the pricing criteria for return receipt service as a whole, and specifically the consideration of the pricing criteria for the various types of return receipt service. Please also see my response to DFC/USPS-T-39-2 above.

Additionally, the larger implicit mark-up for electronic return receipt service is justified by a general policy of conservatively spreading out large changes in price over time.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
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**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"?

**RESPONSE:**

- a. Offhand, I can think of two reasons why a person would purchase Signature Confirmation over Delivery Confirmation without initial desire to access the recipient's signature image by fax or mail. First, having a recipient sign for a mailpiece connotes importance, and a clear message is being sent by the sender to the recipient that the recipient's signature is important. The recipient may also feel some personal importance from being required to provide a signature. Second, the person purchasing Signature Confirmation may want access to the signature image only if there is some question as to whether or not the mailpiece was received or, who, in fact, signed for the mailpiece.
- b. Yes. I believe that the words "if desired" are just as, if not more, accurate in their use in the sentence then if they are removed from the sentence. As the signature image is not automatically provided, the Signature Confirmation customer must take a proactive approach to getting the image, if they so desire that image.

**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY TO  
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**DFC/USPS-T39-11.** Please refer to your testimony at page 77, lines 3–14.

- a. Please confirm that the Postal Service sells #6<sup>3</sup>/<sub>4</sub>, #9, and #10 stamped envelopes.
- b. Please confirm that the length of a #6<sup>3</sup>/<sub>4</sub> stamped envelope is not 6<sup>3</sup>/<sub>4</sub> inches, the length of a #9 stamped envelope is not 9 inches, and the length of a #10 stamped envelope is not 10 inches.

**RESPONSE:**

- a. Confirmed.
- b. Confirmed that the lengths for the Postal Service's stamped envelopes are not exactly 6<sup>3</sup>/<sub>4</sub>, 9, and 10 inches in length.