

**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 NINA YEH (DFC/USPS-T38-1-14)**

June 22, 2006

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

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

Respectfully submitted,

Dated: June 22, 2006

DOUGLAS F. CARLSON

DFC/USPS-T38-1. Please refer to your testimony at page 6, fn. 2. Please provide all documents and other information suggesting that the option to send single-piece Bound Printed Matter at a retail window is too complex for customers.

DFC/USPS-T38-2. Please refer to your testimony at page 6, fn. 2. Please provide all documents and other information suggesting that the option to pay for postage on single-piece Bound Printer Matter using postage stamps is too complex for customers.

DFC/USPS-T38-3. Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will the Postal Service accept postage generated by an Automated Postal Center? (Please note that a knowledgeable customer could generate a label for the necessary postage for single-piece Bound Printed Matter from an APC even though the APC does not offer the option for Bound Printed Matter.)

DFC/USPS-T38-4. Please refer to your testimony at page 6, fn. 2.

- a. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send single-piece Bound Printer Matter with insurance for \$300 be required to pay all the postage, or only the Bound Printed Matter postage, using a postage meter or permit imprint?
- b. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send single-piece Bound Printer Matter with insurance for \$300 be permitted to conduct this transaction at a retail window?

DFC/USPS-T38-5. Please refer to your testimony at page 6, fn. 2. Please provide all other examples of a single-piece postal service that is available to business and individual customers who pay postage using a postage meter or permit imprint but not to customers who use postage stamps.

DFC/USPS-T38-6. Please refer to your testimony at page 6, fn. 2. Suppose a customer uses a postage meter to pay the postage for a single-piece Bound Printed Matter parcel, but the customer is unable to use a collection box, either because the collection time has passed or the item will not fit in the collection box, and the customer's post office does not have a collection drop for parcels. Under the Postal Service's planned regulation, may the customer bring the parcel to a retail window? Please explain.

DFC/USPS-T38-7. Please refer to your testimony at page 6, fn. 2. Please confirm that the rate to mail a particular item as single-piece Bound Printed Matter may be lower than the rate for any other postal service for which that item would qualify. If you do not confirm, please explain.

DFC/USPS-T38-8. Please refer to your testimony at page 6, fn. 2. Please confirm that some items that qualify as Bound Printed Matter do not qualify for Media Mail rates. If you do not confirm, please explain.

DFC/USPS-T38-9. Please refer to your testimony at page 6, fn. 2. Please confirm that a policy or practice exists to discourage window clerks from selling Parcel Post. If you do not confirm, please explain.

DFC/USPS-T38-10. Please refer to your testimony at page 6, fn. 2. Please confirm that a policy or practice, such as, but not limited to, sales goals or quotas, exists to encourage or require window clerks to sell Priority Mail or Express Mail instead of Parcel Post.

DFC/USPS-T38-11. Please refer to your testimony at page 6, fn. 2. Please confirm that post offices in some cities have modified collection boxes to restrict the size, compared to the boxes' original design, of items that can be deposited in the boxes. If you confirm, please identify the maximum height of an item that can be inserted in the box through the top lid and through any snorkel. If you do not confirm, please explain.

DFC/USPS-T38-12. Please refer to your testimony at page 6, fn. 2. Does the Postal Service take the position that preventing customers from mailing single-piece Bound Printed Matter at retail windows would be fair or equitable?

DFC/USPS-T38-13. Please refer to your testimony at page 6, fn. 2. At present, does the Postal Service routinely suggest Media Mail to customers who bring large flats or parcels to the retail window?

DFC/USPS-T38-14. Please refer to your testimony at page 6, fn. 2. Please explain why the regulation described in your testimony would not cause undue or unreasonable discrimination among users of the mail within the meaning of 39 U.S.C. § 403(c).