

# DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

REVISED RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS NEEDHAM TO INTERROGATORIES OF  
DOUGLAS F. CARLSON (DFC/USPS-T39-9 AND 20, AND DFC/USPS-T40-10-11,  
REDIRECTED FROM WITNESS PLUNKETT)

The United States Postal Service hereby provides the revised responses of witness Needham to the following interrogatories of Douglas F. Carlson (DFC/USPS-T39-9 and 20, and DFC/USPS-T40-10-11, redirected from witness Plunkett). The changes are summarized in the attached page.


Each interrogatory is stated verbatim, and the revised response follows.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 6, 1997

## ERRATA TO USPS-T-39 INTERROGATORIES

DFC/USPS-T39-9(d): Replace "who" in the interrogatory to "whose"

DFC/USPS-T39-20: At the end of the interrogatory response add: "For individuals, both collectors and non-collectors alike, there may be a value of the particular stamp on the envelope or the fact that the postage is impressed."

DFC/USPS-T40-10 (Redirected from witness Plunkett): Change "S912.1.1" to "S912.1.4" in the response

DFC/USPS-T40-11 (Redirected from witness Plunkett): Add "or is metered" after "16 ounces" and before ")" in the first sentence of the response

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DFC/USPS-T39-9. Please refer to your response to DFC/USPS-T39-4.

- a. Do customers expect the Postal Service to compensate them for loss or damage to uninsured, nonregistered (i) First-Class Mail, (ii) Priority Mail, or (iii) Parcel Post? If your answer for any of these three classes is no, please explain the basis for your answer and for your statement in DFC/USPS-T39-4 that customers expect the Postal Service to compensate them for loss or damage to uninsured registered mail.
- b. Why doesn't the Postal Service require customers to purchase insurance for all items of value?
- c. Under the current rate structure, why might a customer who elected to purchase registered mail without postal insurance reasonably expect to be compensated for loss or damage?
- d. If satisfying expectations of customers to be compensated for loss or damage of registered mail is a motivation for requiring all customers to purchase insurance for registered mail of declared value greater than \$0, why should all customers be required to purchase insurance just to avoid disappointing customers whose mail was lost or damaged and who specifically chose not to purchase insurance?
- e. Your response to DFC/USPS-T39-4 explains a benefit to the private insurer and suggests that the customer may benefit as well because the insurance company will be reimbursed for the claim. Why is the Postal Service unwilling to give the customer the option of declining postal insurance and taking responsibility for an increase in his insurance premium that may or may not occur if a claim is paid?

RESPONSE:

- a) My understanding is that the Postal Service receives lawsuits for loss or damage to uninsured mail, so I would say presumably yes. With respect to

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DFC/USPS-T39-20. Does the Postal Service believe that the distinctive appearance of the preprinted postage on some stamped envelopes adds value to stamped envelopes.

RESPONSE:

See my testimony, USPS-T-39, at page 96, lines 17-23, and page 97, lines 1-4, for a discussion of the value of service provided by stamped envelopes. The Postal Service primarily provides single stamped envelopes as a convenience for customers in a hurry to mail something while at the post office, for customers who do not want to affix stamps to envelopes, and for customers who do not, for whatever reason, wish to purchase an envelope and a stamp separately. For individuals, both collectors and non-collectors alike, there may be a value of the particular stamp on the envelope or the fact that the postage is impressed.

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(REDIRECTED FROM WITNESS PLUNKETT)

DFC/USPS-T40-10. Please refer to DMM S912.1.1, which describes certified mail, and DMM S917.1.1, which describes return receipt for merchandise. For the purpose of this question, please focus on only these two DMM sections. Please confirm that every substantive element, aspect, or characteristic of the description of certified mail also appears in the description of return receipt for merchandise. If you do not confirm, please explain which elements, aspects, or characteristics of certified mail are not shared by return receipt for merchandise.

RESPONSE:

Not confirmed. A return receipt requested after mailing is available with certified mail service. Furthermore, as evident in DMM S912.1.4, restricted delivery is available with certified mail service, and not with return receipt for merchandise.

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DFC/USPS-T40-11. Please refer to DMM S912.2.1 and DMM 917.2.1. Why may a mailer of certified mail deposit articles in collection boxes (thus exercising his DMM S912.2.5(d) option to forgo proof of mailing) while a mailer using return receipt for merchandise cannot deposit articles in street collection boxes? (Assume that these articles are metered.) Please explain the rationale for these differing requirements.

RESPONSE:

Certified mail is available only for First-Class Mail and Priority Mail, both of which may be deposited in street collection boxes (if the Priority Mail weighs less than 16 ounces or is metered). Return receipt for merchandise service may be used with Priority Mail and various Standard Mail subclasses, some of which may not be entered into the mailstream through street collection boxes. Since certified mail does not require a return receipt, it can be deposited in a street collection box. Return receipt for merchandise service does require a return receipt. Moreover, if an article with return receipt for merchandise service was not entered into the mailstream through a window, the Postal Service could not provide a duplicate return receipt, if needed, because of the lack of a round dated stamped receipt to verify that the service was even requested.

# DECLARATION

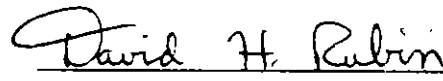
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: 10/6/97

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
David H. Rubin

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