

**DOCKET SECTION**

**BEFORE THE**

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 1997**

**Docket No. R97-1**

**DOUGLAS F. CARLSON  
MOTION TO DESIGNATE EVIDENCE  
FROM DOCKET NO. MC96-3**

**October 17, 1997**

Pursuant to section 1(D) of the *Special Rules of Practice*, I, Douglas F. Carlson, move to designate the following interrogatory responses from Docket No. MC96-3 as evidence in Docket No. R97-1:

OCA/USPS-T5-11 (Tr. 2/252)

OCA/USPS-T7-18 (Tr. 3/688)

OCA/USPS-T7-19 (Tr. 3/689)

These interrogatory responses are relevant to the issues in Docket No. R97-1. The response to OCA/USPS-T5-11 suggests reasons why a large differential exists between the processing costs for stamped cards and the processing costs for private post cards. The reasons for this cost differential are relevant to the fairness and equity of the Postal Service's proposed two-cent fee for stamped cards. In his R97-1 response to DFC/USPS-6, witness Patelunas reaffirmed the validity of his response to OCA/USPS-T5-11. Therefore, OCA/USPS-T5-11 should be admitted into evidence.

In OCA/USPS-T7-18 and OCA/USPS-T7-19, witness Needham suggested that some CMRA's may obtain their mail early in the day via caller service, firm holdout, or special arrangements that allow them to receive their mail at the start of their carrier's route. In R97-1, witness Needham has noted that CMRA boxes are priced higher than

Postal Service boxes.<sup>1</sup> On this evidence, she has concluded that fees for Postal Service boxes should be increased.<sup>2</sup> The Commission, however, already has questioned the comparability of CMRA boxes and Postal Service boxes.<sup>3</sup> Indeed, if CMRA's do, in fact, obtain their mail via caller service, firm holdout, or other special arrangements, they may deliver mail to their boxes earlier than some post offices deliver mail to boxes, thus explaining the fee differential. Since these interrogatory responses do not foreclose the possibility of widespread CMRA use of special arrangements to expedite delivery of their mail, these responses are relevant to the Postal Service's request in Docket No. R97-1 for a fee increase for post-office boxes based in part on a comparison of the fees that CMRA's and the Postal Service charge.

For the reasons explained above, I request that the three Docket No. MC96-3 interrogatory responses listed above be designated as evidence in Docket No. R97-1.

Respectfully submitted,



Dated: October 17, 1997

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DOUGLAS F. CARLSON

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### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and section 3(B) of the *Special Rules of Practice*.



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DOUGLAS F. CARLSON

October 17, 1997  
Emeryville, California

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<sup>1</sup> DFC/USPS-T39-7; USPS-T39 at 66.

<sup>2</sup> *Id.*

<sup>3</sup> See PRC Op. MC96-3 at 64.