

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF POSTAL SERVICE WITNESS KANEER
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T41-7-9)
(July 5, 2006)

The United States Postal Service hereby provides the response of witness Kaneer to the following interrogatories of Douglas Carlson: DFC/USPS-T41-7-9, filed on June 21, 2006.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

DFC/USPS-T41-7. Please refer to your testimony at page 29 and your response to DFC/USPS-T41-2. Please identify the words in the proposed change to the first footnote in Fee Schedule 921 that communicate the Postal Service's proposed intention not to permit a customer to choose the post office that will provide him/her Group E box service. Please do not merely provide a citation to your testimony.

RESPONSE:

There is no "proposed intention not to permit a customer to choose the post office."

With no proposal being made, one should not be surprised that no language in the footnote or my testimony addresses it. The proposed footnote's language is explained in section VII(G) of my testimony. Before the Request was filed, a Wyoming resident eligible for a Group E service could not choose to receive it in Chicago, and the same will be true whether the proposals in this docket are implemented or not.

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DFC/USPS-T41-8. Please confirm that, all else equal, a postal facility that delivers mail to post-office boxes six days a week provides the same value of service to customers as a postal facility that delivers mail to post-office boxes five days a week. If you do not confirm, please explain.

RESPONSE:

I am unaware of any reliable data that would permit one to confirm or disconfirm.

However, the Postal Service provides both five and six day service locations.

Customers are free to choose location and service combinations reflective of their evaluation, while resultant Postal Service revenues encourage additional service where there is unmet demand. Some customers likely prefer six delivery days per week, while others are likely just as satisfied with five delivery days per week. An example of the latter might be a post office box customer who obtains service near her workplace and who works a conventional Monday through Friday work week. Indeed, such a customer might even value five day service more highly than six day service based on a perception that the security of her mail is increased by the fact that the box section is inaccessible on Saturdays, when she will not be visiting her post office box. In any case, numerous factors are considered by management in service level decisions, similar to the process summarized in my response to DFC/USPS-T41-6 regarding post office box cutoff times.

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DFC/USPS-T41-9. Please confirm that, all else equal, a postal facility that provides a means six days a week by which post-office-box customers can pick up accountable mail and mail that is too large for their box provides the same value of service to customers as a postal facility that provides a means only five days a week by which post-office-box customers can pick up accountable mail and mail that is too large for their box. If you do not confirm, please explain.

Response:

See my response to DFC/USPS-T-41-8.