

**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 JAMES W. PAGE (DFC/USPS-T23-13-19)**

**July 10, 2006**

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

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

Respectfully submitted,

Dated: July 10, 2006

DOUGLAS F. CARLSON

**DFC/USPS-T23-13.** Please refer to your response to DFC/USPS-T23-6. Please provide a copy of the portion of “LR-B-5” that pertains to cost estimates for return receipt on which you rely or plan to rely in Docket No. R2006-1.

**DFC/USPS-T23-14.** Please refer to your response to DFC/USPS-T23-8(e).

- a. Please confirm that the cost study on which you rely for estimating the window-acceptance costs of electronic return receipt is a study that was updated in Docket No. R2005-1. If you do not confirm, please explain.
- b. Please confirm that the cost study in Docket No. R2005-1 was based on observations of the window-acceptance time for green Form 3811 electronic return receipts, not electronic return receipts. If you do not confirm, please explain.
- c. Please provide data from a Postal Service data system that shows the number of electronic return-receipt transactions that occurred at each postal facility that the person who conducted the cost study on electronic return receipt visited during the times — or, if times are not available, the days — when he/she visited those facilities. Your response should include separate data for each facility. Please either identify each facility by name and ZIP Code or provide the Postal Service district in which the facility is located.

**DFC/USPS-T23-15.** Please refer to your response to DFC/USPS-T23-8(g), where you state that you did not use raw data for estimating window acceptance time associated with electronic return receipt. Please explain precisely how the time estimate of 0.414 minutes for window acceptance of an electronic return

receipt was derived. For example, if the time is equal to the time for a green Form 3811 return receipt plus an additional amount of time for an electronic return-receipt transaction, your response should include this explanation.

**DFC/USPS-T23-16.** Please refer to your testimony at page 14, lines 22–26 and page 15, lines 1–4. Please explain precisely how the “transaction time greater than that used for traditional return receipts” was derived and whether any cost study underlying this “greater” transaction time was conducted for this docket or a prior docket.

**DFC/USPS-T23-17.** Please provide a copy of Form 3811-A and Form 3811-I.

**DFC/USPS-T23-18.** Please explain precisely how the time estimate of 0.307 minutes for window acceptance of a return receipt was derived.

**DFC/USPS-T23-19.** Please refer to the response to DFC/USPS-T39-14.

- a. Do return receipts that are not accepted at a retail window incur any window-acceptance costs? If yes, please explain.
- b. Please confirm that the time estimate of 0.307 minutes for window acceptance of a return receipt is a weighted-average that considers the substantial percentage of return receipts that are not accepted at a retail window. If you do not confirm, please explain.
- c. Please provide the time estimate for window acceptance of a return receipt that actually is accepted at the retail window.