

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-37 – 40, 43 - 46)  
(July 24, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of Douglas Carlson, filed on July 10, 2006: DFC/USPS-37-40, 43 - 46. Responses to questions 41-42 and 47-48 are still being prepared.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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July 24, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-37.** Please explain how letters that are too thick to be processed on any Postal Service automated equipment are processed.

**Response:**

Letters that are too thick to be processed on any Postal Service automated equipment are processed manually.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-38.** Please explain how the Postal Service's proposal to apply the rate for flats to letters that are too thick for any Postal Service automated equipment reflects the processing environment for these letters and the costs that these letters incur.

**RESPONSE**

The letter category is intended to include pieces that can be handled routinely as letters. If the pieces are too thick for letter automation, then they are likely to be processed manually (please see the response to DFC/USPS-37). Since there is no nonmachinable surcharge for letter shaped pieces under the proposed new structure, it is proposed that these pieces move to the next higher rate cell ,which is the 1<sup>st</sup> ounce rate for flat shaped pieces, plus any applicable additional ounce postage

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-39.** Please explain how letters that fail to meet the criteria for machinability will be processed.

**Response:**

Letters that fail to meet the criteria for machinability will be processed manually.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-40.** Please explain how the Postal Service's proposal to apply the rate for flats to letters that fail to meet the criteria for machinability reflects the processing environment for these letters and the costs that these letters incur.

**RESPONSE**

The letter category is intended to include pieces that can be handled routinely as letters.

If the pieces fail to meet the criteria for machinability, then they are likely to be processed manually (please see the response to DFC/USPS-39). Since there is no nonmachinable surcharge for letter shaped pieces under the proposed new structure, it is proposed that these pieces move to the next higher rate cell, which is the 1<sup>st</sup> ounce rate for flat shaped pieces, plus any applicable additional ounce postage.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-43.** Please assume that a participant will file testimony in this docket proposing a new DMCS section to provide that the Postal Service must offer to customers at retail facilities all classifications for which a single-piece rate category exists in the DMCS and for which an item presented for mailing may be eligible. Please identify all retail practices, policies, or programs — including, but not limited to, sales goals or quotas requiring Postal Service employees to sell particular quantities of certain products — that the Postal Service believes that this proposed DMCS section would affect.

**RESPONSE:**

It is not possible for the Postal Service to conduct such an analysis of its policies, programs and practices until it has had the opportunity to review testimony and proposed DMCS language. In the absence of such specific testimony and DMCS language, the Postal Service is not aware of any policies, programs, or practices that would necessarily be affected by every proposed testimony or DMCS language that fits within the contours of this interrogatory.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-44.** Please confirm that a policy or practice exists to discourage window clerks from selling Parcel Post. If you do not confirm, please explain.

**RESPONSE:**

Not confirmed. There is no policy or practice to discourage window clerks from selling Parcel Post.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-45.** 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 other services such as Parcel Post.

**RESPONSE:**

Not confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

**DFC/USPS-46.** Please confirm that post offices in some cities have modified blue street 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.

**RESPONSE:**

Confirmed that, in areas where mail theft is a particular concern, individual boxes have been fitted with an anti-theft device that has the collateral effect of restricting the maximum height of a piece that will fit through the opening to 1.53 inches.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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