

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
DOUGLAS F. CARLSON (USPS/DFC-T1-1-9) (September 20, 2006)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Douglas F. Carlson:

USPS/DFC-T1-1-9.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037, FAX -5402

USPS/DFC-T1-1. Please refer to page 6, lines 13-22, of your testimony, where you identify tasks associated with the acceptance of a regular return receipt by a window clerk.

- a. How many times have you observed this acceptance process? Please provide all supporting documentation related to these observations.
- b. How many of these observations involved customers other than you?
- c. Are there any functions a window clerk might perform that you have not listed. If yes, please describe fully and explain why you did not list these functions.

USPS/DFC-T1-2. Please refer to page 6, line 25 through page 7, line 6 of your testimony.

- a. How many of this type of transaction have you personally observed or for which you have secondhand knowledge? Please provide any documentation of your observations.
- b. Do you have any documentation to support your claim that “This dialogue likely describes the extent of the discussion for customers who are familiar with the service.” If so, please provide it.

USPS/DFC-T1-3. Please refer to page 7, lines 7 through 16 of your testimony.

- a. How many of this type of transaction have you personally observed or for which you have secondhand knowledge? Please provide any documentation of your observations.
- b. Do you believe it is possible that a customer not familiar with electronic return receipt service might ask more questions, such as:

“Do I need a computer?”;

“What do I do if I don’t have an email address?”;

“Do I get all the same delivery information I get on the green card?”;

“Do I get a real signature?”;

“Do I also get a postcard with the real signature?”; or

“Do you keep the original signature on file in case I need it?”

Please explain any negative response.

USPS/DFC-T1-4. Please refer to your testimony on page 8, lines 17 through 19, where you note the difficulty of observing a statistically significant number of electronic return receipt transactions. Absent a statistically significant number of transaction observations with which to calculate an actual per-piece cost, would not a proxy serve as the next best thing with which to estimate a cost? If no, why not?

USPS/DFC-T1-5. Please provide all studies you conducted and records of observations you made that would provide statistically valid estimates for electronic return receipt window transactions pertaining to:

- 1) Window acceptance transaction times;
- 2) Window acceptance cost development; or
- 3) Window transaction processes cited on page 7, lines 1 through 13, of your testimony.

USPS/DFC-T1-6. Please refer to your testimony on page 8, lines 29 through 30. Is it your opinion that the value of service criterion is the only factor or measurement to consider when determining a cost coverage and a proposed fee? If no, what other factors or measurements would you consider?

USPS/DFC-T1-7. Please refer to your testimony on page 10, lines 1-4. Since you mention that you “have tracked delivery of these items extensively”, please provide the following information.

- a. Please give a breakdown of the destination of the several hundred diplomas; e.g., to the San Francisco area, to other California destinations, to neighboring states, etc.
- b. Was return receipt service purchased for any of the certified mail flats? If yes, please provide the percentage of each type of return receipt service used.
- c. Prior to 2004, how were these diplomas mailed? Were any special services used?

USPS/DFC-T1-8. Please refer to your testimony on page 10, lines 21-23. Is it your opinion that Signature Confirmation is a similar service to certified mail with return receipt service in any other ways besides the time to provide an electronic copy of the signature? Please explain fully.

USPS/DFC-T1-9. On page 9, lines 8-9, of your testimony you state, “In my experience, regular return receipts usually are mailed on the day of delivery.” Please describe your experience in more detail, including the locations from which the return receipt were mailed, all data you collected, and what proportion of regular return receipts were not mailed on the day of delivery.

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.

Brian M. Reimer

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