

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-T1-10-22) (September 28, 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-T1-10-22

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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USPS/DFC-T1-10. Please refer to your testimony on page 9, lines 23 through 24. Is it your understanding that a CFS site is located at the main facility where the post offices, stations and branches will be taking or having their mail taken daily for processing? If not, please explain.

USPS/DFC-T1-11. Please refer to page 11, lines 3 through 6, of your testimony. Did you request the Proof of Delivery letters in all of the 49 cited instances because it was uncertain as to whether or not delivery had taken place? If so, why did you wait approximately two weeks after delivery? If not, for what purpose did you request the Proof of Delivery letters?

USPS/DFC-T1-12. Please refer to page 11, lines 13 through 14, of your testimony. Please quantify, and provide all data/documentation to support your claim of “many instances.”

USPS/DFC-T1-13. Please refer to page 11, lines 20 through 22, of your testimony. For the mailing of certified mail flats you reference, please provide the following information:

- a. Total number of certified mail flats mailed
- b. Was the First-Class postage rate paid or the Priority Mail postage rate or a combination of both?
- c. Number of flats with basic return receipt service
- d. Number of flats with electronic return receipt service
- e. Confirm that this referenced mailing was made in one acceptance event. If you cannot confirm, please provide details as to how many collections or acceptances there were for this “mailing.”
- f. Number of days from initial acceptance of the mailing to the last time you checked for the 10 percent not receiving a scan.

USPS/DFC-T1-14. Please refer to page 11, lines 24 through 28, of your testimony.

- (a) Why didn't you follow up to see if the signatures ultimately were posted?
- (b) Is it possible that the number of unposted signatures is less than 34? If not, why not?

USPS/DFC-T1-15. Please refer to page 11, line 27. through page 12, line 1, of your testimony. With respect to this specific mailing:

- a. Where were these mailpieces destined?
- b. Were all of these mailpieces similarly sized?
- c. What sizes were these mailpieces? Please provide envelope or box dimensions.
- d. What class of mail was used for these mailpieces?

USPS/DFC-T1-16. Please refer to page 12, lines 19 through 23, of your testimony.

- a. In your experience, how many people do you know who use basic return receipt service?
- b. In your experience, how many people do you know who use electronic return receipt service?
- c. What is the nature of the mailings of the people you know from experience who may later need to prove delivery?
- d. What percentage of the mailings with return receipt service of the people you know from experience will later need to prove delivery? Please breakdown by type of return receipt service.

USPS/DFC-T1-17. Please refer to page 14, line 7, of your testimony.

- a. Please define “delay” with respect to a quantifiable amount of time.
- b. Please provide all data and studies you are aware of that you relied on when making this statement.

USPS/DFC-T1-18. Please refer to page 14, lines 26 through 28, of your testimony. By “overwhelming desire for certified mail customers to obtain the recipient’s signature” are you referring to a pen and ink signature or signature image? If not a pen and ink signature, please explain fully.

USPS/DFC-T1-19. Please refer to page 15, lines 2 through 8, of your testimony.

- a. Do you believe that any mail service sold at a window unit incurs window acceptance costs? If your answer is anything other than an unqualified “yes”, please explain fully.
- b. Do you believe the electronic return receipt service is only “sending an e-mail message”? If not, please explain fully.
- c. Do you think it is possible that the Postal Service would need to explain electronic return receipt service to some customers (such as how to provide the email address), even if it were included as part of certified mail service? If not, please explain fully.

USPS/DFC-T1-20. Please refer to page 15, lines 9 through 10, of your testimony. Please confirm that regardless of how certified mail customers currently deposit mail, they can have access to the original signature by using basic return receipt. If you cannot confirm, please explain fully.

USPS/DFC-T1-21. Please refer to page 15, lines 13 through 15, of your testimony.

- a. Please confirm that electronic return receipt service provides an electronic image of a signature. If you cannot confirm, please explain.
- b. Considering that .09 percent of the certified mail customers purchasing return receipt service in 2005 requested electronic return receipt service and 86.8 percent of certified mail customers requested basic return receipt service, would you agree that “most” certified mail customers want the original signature and not the electronic signature image? If not, please explain fully.
- c. Do you believe that at least some certified mail customers want the original signature, rather than a copy of the signature image? Please explain any negative response.
- d. Why should any certified mail customers be forced to pay more for certified mail service because of the addition of a service feature they don’t ever use?

USPS/DFC-T1-22. Please refer to page 15, line 29, through page 16, line 2, of your testimony.

- a. Would you propose that electronic return receipt service be included as part of the basic service for COD, insured mail and registered mail? Please explain fully.
- b. Specifically how would the classification schedule be simplified if an electronic copy of the signature was a basic feature of certified mail? Please explain fully.
- c. How would the convenience of certified mail service be increased for any other than the non-high-volume electronic return receipt customers if the electronic copy of the signature was a basic feature of certified mail? Please explain fully.

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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