

# DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
DOUGLAS F. CARLSON  
(DFC/USPS-33)

The United States Postal Service hereby provides responses to the following interrogatory of Douglas F. Carlson: DFC/USPS-33, filed on December 5, 1997. Objections to interrogatories DFC/USPS-30-32, 34 were filed on December 15, 1997. An objection to interrogatory DFC/USPS-35 was filed on December 12, 1997.

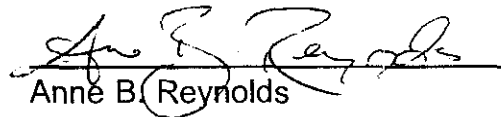
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

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December 19, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-30.** Please discuss the extent to which the data provided in the responses to DFC/USPS-16 and DFC/USPS-29 accurately reflect the number of Consumer Service Cards that customers actually submitted and the number of telephone, written, or in-person complaints that actually were transferred to Consumer Service Cards in accordance with the procedures described in Attachment A to the response to DFC/USPS-15. Please state the basis for your answer.

RESPONSE: Objection filed, December 15, 1997.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-31.** Please discuss the extent to which postal employees follow the procedures described in Attachment A to the response to DFC/USPS-15 (pages 2-3) in *transferring customer complaints to Consumer Service Cards*. Please state the basis for your answer.

RESPONSE: Objection filed, December 15, 1997.

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**DFC/USPS-32.** Please discuss all procedures that the Postal Service uses to audit postal employees' compliance with the procedures described in Attachment A to the response to DFC/USPS-15. Please provide the results of any audits or procedures.

RESPONSE: Objection filed, December 15, 1997.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DFC/USPS-33.** In his response to DBP/USPS-33(d), witness Plunkett suggested that local managers can obtain customer feedback on the problems with return-receipt service by monitoring Consumer Service Card data. In DFC/USPS-17, I specifically referred to the response to DBP/USPS-33(d) and requested all information that is available in summary form about the specific types of problems that customers have experienced with return receipts. The response to my interrogatory stated that “[d]ata on the *types* of problems reported regarding return receipts is not compiled.” Please explain how the summary data provided in the response to DFC/USPS-17 would, as witness Plunkett suggests, assist local managers in identifying the *types* of problems customers experience with return-receipt service. If additional information is, in fact, available, please provide it.

RESPONSE: In his response to DBP/USPS-33(d), witness Plunkett stated that “local managers have access to customer feedback via consumer service cards and other means. They are expected to use these data to improve their performance . . . .” In your discovery request DFC/USPS-18, you asked for “all information that is available in summary form about the specific types of problems that customers have experienced with return receipts.” In response to that interrogatory, the Postal Service provided you with the only information it had in summary form regarding return receipts comments from Consumer Service Cards. This information only showed the numbers of comments that were reported, and did not, as the response indicated, specify the types of problems that customers may have reported. The information provided to you in response to DFC/USPS-18 is the only summary information that the Postal Service compiles regarding return receipt from Consumer Service Cards. It does not encompass any individual communications that may be made to managers locally, either through Consumer Service Cards or by other means.

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**DFC/USPS-34.** Page 2 of Attachment A to the response to DFC/USPS-15 prescribes the procedures by which each customer complaint must be recorded on "customer complaint control logs" at every post office and the information that must be included in those logs. In the past year, I have submitted eight Consumer Service Cards to various post offices but have not received a response or acknowledgement to these cards. To assist me in evaluating the reliability of the data that the Postal Service provides in its response to DFC/USPS-17-18 and DFC/USPS-29, for parts (a)-(h) below please provide (1) a photocopy of the relevant page(s) of the customer complaint control logs for the post office that received my Consumer Service Card and (2) an explanation of why I received neither an "initial contact" nor a "final response." I consent to disclosure of all information related to my complaint. (The date listed in each part is the date on which I mailed the Consumer Service Card.)

- a. December 24, 1996; Anchorage, AK; Subject: Collection-times sticker missing from a collection box.
- b. July 5, 1997; Oakland, CA; Subject: Collection-times sticker missing from a collection box.
- c. July 5, 1997; San Francisco, CA; Subject: Collection times of collection boxes at San Francisco International Airport.
- d. August 16, 1997; Statesville, NC; Subject: Collection-times sticker missing from a collection box.
- e. August 16, 1997; Oakland, CA; Subject: Collection-times sticker missing from a collection box.
- f. August 16, 1997; Knoxville, TN; Subject: Collection-times sticker missing from a collection box.
- g. August 16, 1997; Blacksburg, VA; Subject: Collection-times sticker missing from a collection box.
- h. August 16, 1997; Colonial Heights, VA; Subject: Collection-times sticker missing from a collection box.

RESPONSE: Objection filed, December 15, 1997.

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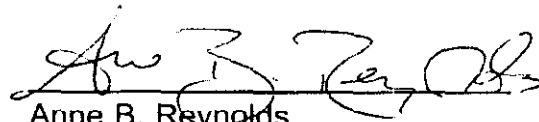
**DFC/USPS-35.** In the response to DBP/USPS-33(g)-(j), the Postal Service cited a response from witness Larson in Docket No. R87-1. This response confirmed that a policy existed to deliver accountable mail to federal government agencies in the Washington, DC, area "with the return receipt attached and leave it up to the agency to complete the return receipt by themselves and mail it at a later time." The response also states that "[t]his return receipt procedure exists for other large organizations."

- a. Does this policy or procedure still exist?
- b. Does this response accurately portray current practices or procedures?
- c. If the answer to part (b) is anything other than an unqualified yes, please provide the date by which this policy or procedure had been discontinued.
- d. If the answer to part (b) is anything other than an unqualified yes, please explain the process by which this policy or procedure was eliminated.
- e. Please explain the process by and basis on which the Postal Service has determined that this policy or procedure has been discontinued nationwide. (My assumption that the Postal Service claims that this policy has been discontinued follows from the response to DFC/USPS-T40-16-18.) In your answer, please distinguish between (1) the absence of information indicating that a situation exists and (2) information specifically confirming that a situation does not exist.

RESPONSE: Objection filed, December 12, 1997.

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
December 19, 1997