

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF POSTAL SERVICE WITNESS BERKELEY
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T39-12-17)

The United States Postal Service hereby files the responses of witness Berkeley (USPS-T-39) to the above listed interrogatories, filed on May 31, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF POSTAL SERVICE WITNESS BERKELEY (USPS-T-39)
TO INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-12-17)**

DFC/USPS-T39-12. Please provide the exact volume of electronic return receipts in FY 2005.

RESPONSE:

The FY 2005 electronic return receipt volume was 234,366. Please see USPS-LR-L-123, WP-20.

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DFC/USPS-T39-13. Please discuss the extent, based on volume, to which electronic return receipt has been a marketplace failure.

RESPONSE:

The Postal Service does not see electronic return receipt service as a marketplace failure. This service is new, and as is the case with new services, it takes time for public awareness and, consequently volume, to increase. It is likely that return receipt consumers are waiting to see if the signature image from an electronic return receipt, as opposed to a “pen and ink” signature from a green card return receipt, is acceptable for their needs.

On a related note, it is my understanding that the Internal Revenue Service (IRS) is planning to begin official use of the electronic return receipt service later on this year. This may persuade other customers to begin using the electronic return receipt service as well.

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DFC/USPS-T39-14. Please provide the percentage of regular (green Form 3811) return-receipt volume that customers purchased at a retail window.

RESPONSE:

The Postal Service does not have the exact data requested, in the form requested. However; Point-Of-Sale (POS) terminal data for Fiscal Year 2005 indicate that 62,393,378, or 30 percent, of the 207,537,895 green card return receipts were sold at retail windows connected to the POS system. As approximately 48 percent of all retail window units are part of the POS system, it is safe to assume that the actual percentage of green card return receipts sold at retail windows in 2005 was higher than the 30 percent sold at POS units.

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DFC/USPS-T39-15. Please provide the percentage of electronic return receipts for which the mail piece was delivered but for which no signature is on file in Postal Service delivery records.

RESPONSE:

During the period from April 1 through June 1, 4.2 percent of the mailpieces with electronic return receipt service purchased received a scan indicating a final disposition, but did not have a signature linked to the mailpiece.

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DFC/USPS-T39-16. Please identify any sales goals, practices, policies, or requirements, such as, but not limited to, revenue quotas or goals, that may encourage window clerks to sell regular (green Form 3811) return receipts instead of electronic return receipts.

RESPONSE:

The Postal Service does not have any sales goals, practices, policies, or requirements, such as, but not limited to, revenue quotas or goals, that would encourage window clerks to sell green card (Form 3811) return receipts instead of electronic return receipts.

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TO INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-12-17)**

DFC/USPS-T39-17. Please confirm that the Postal Service's proposal in Docket No. R2001-1 to provide access to the date and time of delivery for certified mail items via telephone and Internet as a part of basic certified mail service did not include window-service costs associated with the time for window clerks to explain this service feature to customers. If you do not confirm, please explain.

RESPONSE:

Not confirmed. I can confirm that the special study per-piece cost for providing delivery data, presented in USPS-LR-J-135, Section D, of Docket No. R2001-1 did not include any window service costs. I cannot confirm whether or not the aggregate cost for certified mail, as presented in the roll-forward cost model, included costs related to explanation by window clerks to customers of the proposed enhancement to certified mail.