

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. BERKELEY (DFC/USPS-T39-36-42)**

June 22, 2006

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Susan W. Berkeley.

The instructions accompanying DFC/USPS-T34-1–4 are incorporated herein by reference.

Respectfully submitted,

Dated: June 22, 2006

DOUGLAS F. CARLSON

DFC/USPS-T39-36. Please refer to your response to DFC/USPS-T39-21.

Please confirm that you are aware of no actual, specific legal requirements for an “original pen and ink signature” on a green Form 3811 return receipt, as opposed to an electronic return receipt, to establish proof of delivery. If you do not confirm, please specifically identify the legal requirements of which you are aware and whose existence you can confirm.

DFC/USPS-T39-37. Please refer to your response to DFC/USPS-T39-21.

Please provide the basis for your general awareness that “some customers are concerned that court systems, in certain instances, will only accept a green card return receipt, as opposed to an electronic return receipt.”

DFC/USPS-T39-38. Please refer to your response to DFC/USPS-T39-22.

Please state the basis for your belief about the development of the law on the acceptance of electronic return receipt service as a substitute for green card return receipt service.

DFC/USPS-T39-39. Please refer to your response to DFC/USPS-T39-25.

Please confirm that you are aware of no specific instance in which a sender needed a copy of the recipient’s signature faster than, under normal conditions, the signature would have arrived by mail on a green Form 3811 return receipt. If you do not confirm, please provide specific examples.

DFC/USPS-T39-40. For any service for which the Postal Service collects a signature upon delivery on a Form 3849 and electronically attaches or connects an image of this signature to the electronic delivery record or article number,

does the Postal Service possess any electronic record of either the date on which any Forms 3849 were scanned or the date on which the image of a signature from a Form 3849 was electronically attached or connected to the delivery record or article number?

DFC/USPS-T39-41. Please refer to your response to DFC/USPS-T39-29.

Please provide examples of the Postal Service conservatively spreading out large price decreases over time.

DFC/USPS-T39-42. Please refer to your response to DFC/USPS-T39-29.

Please explain how conservatively spreading out large price decreases over time would benefit postal customers.