

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-T39-30-35)

The United States Postal Service hereby files the responses of witness Berkeley (USPS-T-39) to the above listed interrogatories, filed on June 16, 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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June 30, 2006

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-30-35)**

DFC/USPS-T39-30. Please refer to your response to DFC/USPS-T39-13. Please explain whether the Internal Revenue Service will use electronic return receipt as a sender or a recipient. If the Internal Revenue Service will use the service as a sender, please explain how the service will work, and please explain whether other customers can purchase this service without visiting a retail window.

RESPONSE:

It is my understanding that the Internal Revenue Service (IRS) will use electronic return receipt service as both a sender and recipient. As a sender using electronic return receipt service with certified mail, the IRS will participate in the Bulk Proof of Delivery Program.

Participation in this program requires the IRS to upload an electronic file of the certified mail articles requesting electronic return receipt service. The Postal Service then appends the IRS's signature extract file with the requested signature records, and the IRS downloads the signature files for the delivered articles.

The Bulk Proof of Delivery Program allows other customers to purchase electronic return receipt service without having to visit a retail window. Details on this program may be found in Publication 80, Bulk Proof of Delivery Program, available online at www.usps.com.

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DFC/USPS-T39-31. Please refer to your response to DFC/USPS-T39-14, in which you state that “approximately 48 percent of all retail window units are part of the POS system[.]” Please define “retail window units.” For example, if a post office has a main office and a station, and the main office has six service windows with POS terminals and the station has four service windows with POS terminals, how many “retail window units” does that post office have?

RESPONSE:

By “retail window units”, I meant retail postal facilities. Out of approximately 37,000 retail postal facilities, over 17,000 of these facilities are part of the POS system. In the example you provide, with a main office and a station, I would consider that two retail window units.

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DFC/USPS-T39-32. Please refer to your response to DFC/USPS-T39-15.

- a. Does the Postal Service consider a failure rate of 4.2 percent to be acceptable?
- b. Please explain why no signature is on file for 4.2 percent of electronic return receipts.

RESPONSE:

- a. A failure rate of 4.2 percent (in isolation) is not acceptable.
- b. The Postal Service does not collect information on the reason why a signature is not on file. A signature would not be on file for several reasons. First, it is possible that the delivery employee failed to obtain the signature. Second, perhaps the barcode and human-readable numbers on the Form 3849 were not readable, therefore making it impossible for the signature to be linked to the appropriate mailpiece. Finally, the signature may not have been captured at the Computerized Forwarding System site.

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DFC/USPS-T39-33. Please confirm that no signature may be on file for some certified mail items to which a green Form 3811 return receipt was attached and that, for these same items, the Postal Service may have obtained a signature on the return receipt and mailed the return receipt to the customer.

RESPONSE:

Confirmed that the scenario you posit is certainly possible, though probably rare.

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DFC/USPS-T39-34. Please provide all facts and information indicating the percentage of green Form 3811 return receipts for which the Postal Service did not collect a signature or that the Postal Service did not return to the sender.

RESPONSE:

The Postal Service does not electronically capture any information from the green card return receipts returned to the sender of the original mailpiece.

Therefore, we have no way of determining the actual percentage of green card return receipts for which a signature was not collected or was not returned to the sender.

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DFC/USPS-T39-35. Please refer to the response to DFC/USPS-T39-14. Please provide the return-receipt volume that was collected in IRT transactions.

RESPONSE:

The IRT system does not collect detailed enough information to provide a volume for return receipts. The total sales value of the Postage Validation Imprinter (PVI) label is recorded, and, as such, this provides the total price of the mailpiece without a breakdown of the rate and applicable fees.