

**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-T39-21-29)**

June 7, 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 7, 2006

DOUGLAS F. CARLSON

DFC/USPS-T39-21. Please provide the basis for your statement in your testimony at page 64, lines 5–8 that the “original pen and ink signature” may be “a legal requirement for proof of delivery in some instances.”

DFC/USPS-T39-22. Please provide all instances known to you of a legal requirement that causes customers to purchase green Form 3811 return receipts instead of electronic return receipts.

DFC/USPS-T39-23. Please provide the percentage of electronic return receipt transactions for which the customer subsequently visited the Postal Service Web site and completed the process for requesting the recipient’s signature.

DFC/USPS-T39-24. Please refer to your response to DFC/USPS-T39-2.

- a. Please explain how the capture of the signature “could be of a high value to the mailpiece recipient[.]”
- b. Please estimate the portion of the value of return-receipt service that should be attributed to the value of the service, if any, to the recipient.

DFC/USPS-T39-25. Please provide examples in which a sender would need a copy of the recipient’s signature faster than the signature would arrive by mail on a green Form 3811 return receipt.

DFC/USPS-T39-26. For host services for which customers can purchase a return receipt, please query a Postal Service data system and provide the number of days after delivery for the recipient’s signature to become available to the purchaser of an electronic return receipt or a return receipt after mailing. In your response, please provide both the average number of days and a list showing the percentage share of the total for each number of days (e.g., 10 percent of signatures are available two days after delivery, 50 percent are available three days after delivery, 20 percent are available four days after delivery, 10 percent are available five days after delivery, etc.).

DFC/USPS-T39-27. Please refer to your response to DFC/USPS-T39-2. Please explain why a customer who does not maintain delivery records in electronic format would derive a higher value “for storing and organization purposes” from an electronic return receipt than a hard-copy return receipt.

DFC/USPS-T39-28. For items sent via certified mail with restricted delivery during a transaction at a retail window, please provide the percentage of items that were refused or returned to the sender unclaimed.

DFC/USPS-T39-29. Please refer to your response to DFC/USPS-T39-9. Please explain precisely which proposed fee you believe is justified by a “general policy of conservatively spreading out large changes in price over time.”