

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORIES OF DOUGLAS F. CARLSON  
(DFC/USPS-T23-1-5)  
(June 15, 2006)

The United States Postal Service hereby provides the responses of witness Page (USPS-T-23) to the above listed interrogatories of Douglas F. Carlson, filed on June 1, 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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**DFC/USPS-T23-1.** Please refer to the specific line in your testimony or Excel spreadsheet cell in which the cost associated with the time for a customer to fill out a green Form 3811 return receipt is captured in the window acceptance costs for green Form 3811 return receipts.

**RESPONSE:**

The cost to fill out the Form 3811 is not captured, because filling out the form generally is not part of the window acceptance process. The Form 3811 usually is filled out by the customer before he goes to the window. If the customer arrives at the window without the form filled out, the clerk is supposed to ask the customer to stand aside and fill out the form, and then wait on the next customer. Once the form is filled out, the customer may return to the front of the line.

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**DFC/USPS-T23-2.** Please confirm that your estimate of the window acceptance cost for electronic return receipt includes the time required for a customer to fill out a green Form 3811 return receipt. If you do not confirm, please explain with specific reference to your testimony at page 14, lines 23–26.

**RESPONSE:**

Not confirmed. The testimony that you reference does not state that time spent filling out the Form 3811 is included. See also my responses to interrogatories T23-1 and 3.

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**DFC/USPS-T23-3.** Please refer to your testimony at page 14, line 26 and page 15, lines 1–4. Please explain how you calculated the window acceptance time for electronic return receipt.

**RESPONSE:**

As stated in my testimony (page 14, lines 22-26), I used the numbers from Docket No. R2005-1 (with minor simplification), because of the absence of new data on window times for electronic return receipts. See USPS-LR-L-59, Attachment 11, page 8.

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**DFC/USPS-T23-4.** If a window clerk describes electronic return receipt or a green Form 3811 return receipt but the customer does not purchase any type of return receipt, with which service or transaction is this time associated or charged?

**RESPONSE:**

It is my understanding that the In-Office Cost System puts this time in a general inquiry bucket not directly allocated to a particular service or transaction.

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**DFC/USPS-T23-5.** How many electronic return receipt transactions did you observe before you wrote your testimony?

**RESPONSE:**

I became responsible for the return receipt portion of my testimony shortly before we filed this rate case. While I did not observe electronic return receipt transactions before adopting the testimony, the person who prepared the study and drafted the testimony did make visits to window units. When he left the Postal Service for another job, I adopted this testimony.