

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-T39-21-29)

The United States Postal Service hereby files the responses of witness Berkeley (USPS-T-39) to the above listed interrogatories, filed on June 7, 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 UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO  
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-21-29)**

**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.”

**RESPONSE:**

It is my understanding that a Form 3811, green card return receipt, with an “original pen and ink” signature, may be legally required for proof of delivery. To the best of my knowledge, legal proof of delivery of certain documents and the like may be required in some instances for delivery of summonses and other court documents, rights to cancel contractual agreements, tax collection notices, child support payment requests/garnishments, legal notices for public hearings, etc.

Regardless of any legal requirement, I am generally aware 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.

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**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.

**RESPONSE:**

Please see my response to DFC/USPS-T39-21. I believe that in those instances where a return receipt may be a legal requirement, most of those return receipts currently serving as legal proof of delivery are Forms 3811, green card return receipts. I believe that the law is still developing on the acceptance of electronic return receipt service as a substitute for green card return receipt service. It would not surprise me if electronic return receipt service becomes allowable as legal proof of delivery for more and more current return receipt users who may be using the service to satisfy a legal requirement.

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**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.

**RESPONSE:**

During the period from March 1 through May 31, 105,147 electronic return receipts were purchased. During that same period, 42,989 requests for delivery information were made via usps.com. Dividing the number of requests by the number of electronic return receipts purchased results in 41 percent. It is important to note, though, that this may not be an exact percentage because more than one request could be made for the same electronic return receipt. Additionally, requests were made during this period for return receipts purchased before the period. Conversely, return receipts were purchased during the period and the requests for service came after the period ended.

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**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.

**RESPONSE:**

a-b. Request of a signature connotes importance. Most mailpieces are delivered without fanfare. When a letter carrier comes to the door for a signature or a recipient is left an attempted delivery notice for an accountable mailpiece, immediately there is an indication that there is something special about the mailpiece. The recipient of the mailpiece more than likely comes to the realization that the sender had to make some effort (be it in preparation, getting the mailpiece accepted, paying more, etc.) over the effort involved in sending a non-accountable mailpiece, to get the Postal Service to get a signature. Not only is the mailpiece important – the recipient is important as the mailer values their receipt of the mailpiece enough to pay more for this service. As the signature value of accountable mail is subjective and varies from individual case to individual case, it is really difficult to generally assign a portion of the value of service to the sender and a portion to the recipient. Overall, I would believe that the signature value is probably more valuable to the sender than the recipient, yet the signature value to the recipient should not be overlooked.

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**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.

**RESPONSE:**

I would imagine that there are a myriad of situations where a sender would be in a hurry to receive signature proof of delivery. Maybe the sender needs a signature delivery before they can proceed with something – a legal procedure or something else which may have a deadline or, for whatever other reason, would need to be handled expeditiously.

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**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.).

**RESPONSE:**

These data are not readily available by querying Postal Service data systems.

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**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.

**RESPONSE:**

The portion of the interrogatory response:

“...The intrinsic high value to the electronic return receipt, in addition to the delivery record information provided by the green card, is the quicker access to this information and access to this information on-line at any time right after the delivery takes place. In these high-technology times, an electronic format for delivery records is undoubtedly a higher value to customers than green card records, for storing and organization purposes.”

referred to the advantages for electronic return receipt customers of electronic return receipts over green card return receipts. Thus, I don't think a customer who does not maintain records in electronic format would derive a higher value from electronic return receipts over green card return receipts.

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**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.

**RESPONSE:**

The Postal Service does not capture information on “refused” or “return to sender” certified mail with restricted delivery on a consistent basis. Therefore, we do not calculate the requested percentage.

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**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.”

**RESPONSE:**

The entire sentence, with the phrase you quoted, reads:

“Additionally, the larger implicit mark-up for electronic return receipt service is justified by a general policy of conservatively spreading out large changes in price over time.”

The reference is to the proposed fee for electronic return receipts.