

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAGE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T23-6-12)
(July 5, 2006)

The United States Postal Service hereby provides the responses of witness Page to the above listed interrogatories of Douglas F. Carlson, 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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DFC/USPS-T23-6. Please refer to your response to DFC/USPS-T23-1.

- a. Please confirm that a window clerk's act of asking a customer to stand aside and fill out a green Form 3811 return receipt takes time. If you do not confirm, please explain. If you do confirm, please identify the service to which the cost of this time is attributed.
- b. Please confirm that a window clerk may instruct a customer how to fill out a green Form 3811 return receipt. If you do not confirm, please explain. If you do confirm, please identify the service to which the cost of this time is attributed.

RESPONSE:

a. and b. Confirmed. While I used the results of the window transaction study presented in library references L-78, L-79, and L-81, I have since been informed that this study did not produce an adequate estimate of the time for a return receipt transaction. I was using an average time for several different special services that I have since been informed is not representative of the time for a return receipt transaction. Most of the transactions underlying that time were for Delivery Confirmation service. I therefore plan to file errata, in which I will go back to the acceptance times used in Docket No. R2005-1. Those acceptance times were based on a study done specifically for return receipt service for Docket No. R77-1. That study was presented in LR-B-5, which stated, at page 3, that at the originating office, "the clerk accepts and reviews the required data on Form 3811, return receipt, stamps the piece of mail 'return receipt required,' affixes the form to the piece of mail, accepts fee, and attaches postage." That is all the information I have about how different activities may have been considered as part of the return receipt window transaction. I use results from studies designed to measure transaction times at the window. These window

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transaction studies are not used to distribute (“attribute”) the pool of all window costs to individual subclasses and services, so I cannot identify the service to which any particular window activity was “attributed.”

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DFC/USPS-T23-7. Please confirm that, regardless of whether the customer fills out a green Form 3811 return receipt before arriving at the window or after standing aside and filling out the form, as you describe in your response to DFC/USPS-T23-1, the clerk may need to write, place, or otherwise indicate the article number on the return receipt. If you do not confirm, please explain. If you confirm, please explain, for each service for which a customer can purchase a return receipt, the various methods by which the clerk may place the article number on the return receipt, and please identify the service to which the cost of this clerk time is attributed.

RESPONSE:

Confirmed. I do not know all the ways a clerk may place the article number on the return receipt. With respect to the attribution of the cost of this clerk time, please see my response to DFC/USPS-T23-6.

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DFC/USPS-T23-8. Please refer to your response to DFC/USPS-T23-5.

- a. How many days before the Postal Service filed Docket No. R2006-1 did you become responsible for the “return receipt portion” of your testimony?
- b. Please provide the name and title of the person who “prepared the study and drafted the testimony[.]”
- c. Please identify the testimony text related to the cost estimate for electronic return receipt that you wrote, and please identify the testimony text related to the cost estimate for electronic return receipt that the person who “prepared the study” wrote.
- d. How many post offices did the person who “prepared the study” visit before estimating the cost of electronic return receipts? Please provide the source for your response.
- e. How many transactions did the person who “prepared the study” observe before estimating the cost of electronic return receipts? Please provide the source for your response.
- f. Please describe the contents of the typical discussion that the person who “prepared the study” observed between the window clerk and the customer. Please provide the source for your response.
- g. Please provide the raw data that the person who “prepared the study” used to estimate the window-acceptance time associated with electronic return receipt.

RESPONSE:

- a. 3 to 6 weeks. However, I had worked with the cost analyst during this and the previous docket as he prepared his workpapers and testimony.
- b. The person who initially prepared this testimony was an Economist in Special Studies. He is no longer employed by the Postal Service.
- c. As the witness for my testimony (USPS-T-23), I am responsible for the entire text, which I reviewed and adopted. Please refer to my response to part (a) above.

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d. I do not know. It is standard practice for cost analysts in Special Studies to visit field offices to observe postal practices and familiarize themselves with postal products, but I do not know how many visits this particular analyst may have made. I, however, adopted this testimony, and I have been employed by the Postal Service in various capacities and in several types of facilities for 42 years.

e. I do not know. Please refer to the response to part (d) above. It is worth noting that the cost study in question represents an update of previous work presented in various forms since Docket No. R2000-1, and most recently updated and presented in Docket No. R2005-1.

f. I am not aware of the contents of the typical discussion. Please refer to my responses to parts (d) and (e) above.

g. No raw data were used by me in estimating the window acceptance time associated with electronic return receipt for this rate case, since I used the numbers from Docket No. R2005-1. See my responses to DFC/USPS-T23-3, DFC/USPS-T23-6, and to part (e) above.

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DFC/USPS-T23-9. Please refer to USPS-LR-L-59. Please explain why a printing cost is associated with electronic return receipt.

RESPONSE:

A form 3811-I is an informational handout provided to customers at IRT stations about how to go to the postal website to sign up to receive the electronic return receipt. See witness Berkeley's response to DFC/USPS-T39-20.

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DFC/USPS-T23-10. Please refer to USPS-LR-L-59. Please explain what duplicate requests are, why they arise, and how they are processed.

RESPONSE:

Duplicate requests are when a customer wishes to get an additional delivery record. A form 3811-A is filled out, and for an electronic return receipt the delivery record is emailed back.

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DFC/USPS-T23-11. Please confirm that, regardless of whether the customer fills out a green Form 3811 return receipt before arriving at the window or after standing aside and filling out the form, as you describe in your response to DFC/USPS-T23-1, the clerk may need to remove the backing strips from the adhesive and affix the return receipt to the item being mailed. If you do not confirm, please explain. If you confirm, please identify the service to which the cost of this clerk time is attributed.

RESPONSE:

Please refer to the response to DFC/USPS-T23-6.

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DFC/USPS-T23-12. To which service is the time associated with the clerk selecting the return-receipt option on the retail terminal attributed?

RESPONSE:

Please refer to the response to DFC/USPS-T23-6.