

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T38-1 - 14)**

The United States Postal Service hereby provides the responses of witness Yeh to the following interrogatories of Douglas F. Carlson, filed on June 22, 2006:

DFC/USPS-T38-1 - 14.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 6, 2006

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-1. Please refer to your testimony at page 6, fn. 2. Please provide all documents and other information suggesting that the option to send single-piece Bound Printed Matter at a retail window is too complex for customers.

Response: It is not my testimony that the option to send Single-Piece Bound Printed Matter at a retail window is too complex for customers. The footnote you cite merely relates my understanding of a management decision to have window clerks offer only those services most likely to be used by customers in order to streamline the retail transaction for both customers and clerks.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-2. Please refer to your testimony at page 6, fn. 2. Please provide all documents and other information suggesting that the option to pay for postage on single-piece Bound Printer Matter using postage stamps is too complex for customers.

Response: Please see my response to DFC/USPS-T38-1.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-3. Please refer to your testimony at page 6, fn. 2. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will the Postal Service accept postage generated by an Automated Postal Center? (Please note that a knowledgeable customer could generate a label for the necessary postage for single-piece Bound Printed Matter from an APC even though the APC does not offer the option for Bound Printed Matter.)

Response: As stated in the footnote you cite, the Postal Service's intention is to require that Bound Printed Matter "be paid either by customer-generated postage meter or by permit imprint." My understanding is that Postal Service-generated postage, such as from an APC, is not considered either "customer-generated postage meter" or "permit imprint."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-4. Please refer to your testimony at page 6, fn. 2.

- a. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send single-piece Bound Printer Matter with insurance for \$300 be required to pay all the postage, or only the Bound Printed Matter postage, using a postage meter or permit imprint?
- b. If the Postal Service proceeds with its plan to issue the regulation described in your testimony, will a customer seeking to send single-piece Bound Printer Matter with insurance for \$300 be permitted to conduct this transaction at a retail window?

Response:

(a) It is my understanding that the planned requirement that “Bound Printed Matter” be paid only by these two methods refers to the Bound Printed Matter piece, which would include any extra services on that piece, and not just the BPM postage as your question posits.

(b) My understanding is no, based on the reasons I mention above.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-5. Please refer to your testimony at page 6, fn. 2. Please provide all other examples of a single-piece postal service that is available to business and individual customers who pay postage using a postage meter or permit imprint but not to customers who use postage stamps.

Response: I am not aware of any.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-6. Please refer to your testimony at page 6, fn. 2. Suppose a customer uses a postage meter to pay the postage for a single-piece Bound Printed Matter parcel, but the customer is unable to use a collection box, either because the collection time has passed or the item will not fit in the collection box, and the customer's post office does not have a collection drop for parcels. Under the Postal Service's planned regulation, may the customer bring the parcel to a retail window? Please explain.

Response: I am not an expert on mail entry issues but it is my understanding that a customer may drop off properly paid BPM (or any other class of mail) at a retail window even when no other transaction is involved.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-7. Please refer to your testimony at page 6, fn. 2. Please confirm that the rate to mail a particular item as single-piece Bound Printed Matter may be lower than the rate for any other postal service for which that item would qualify. If you do not confirm, please explain.

Response: Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-8. Please refer to your testimony at page 6, fn. 2. Please confirm that some items that qualify as Bound Printed Matter do not qualify for Media Mail rates. If you do not confirm, please explain.

Response: Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-9. Please refer to your testimony at page 6, fn. 2. Please confirm that a policy or practice exists to discourage window clerks from selling Parcel Post. If you do not confirm, please explain.

Response: I do not know. Please note that Parcel Post is not within the scope of my testimony generally or the specific footnote cited in your question.

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DFC/USPS-T38-10. Please refer to your testimony at page 6, fn. 2. Please confirm that a policy or practice, such as, but not limited to, sales goals or quotas, exists to encourage or require window clerks to sell Priority Mail or Express Mail instead of Parcel Post.

Response: I do not know. Please note that Parcel Post, Priority Mail, and Express Mail are not within the scope of my testimony generally or the specific footnote cited in your question.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
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DFC/USPS-T38-11. Please refer to your testimony at page 6, fn. 2. Please confirm that post offices in some cities have modified collection boxes to restrict the size, compared to the boxes' original design, of items that can be deposited in the boxes. If you confirm, please identify the maximum height of an item that can be inserted in the box through the top lid and through any snorkel. If you do not confirm, please explain.

Response: I do not know. Please note that the issue of collection box modification is not within the scope of my testimony generally or the specific footnote cited.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
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DFC/USPS-T38-12. Please refer to your testimony at page 6, fn. 2. Does the Postal Service take the position that preventing customers from mailing single-piece Bound Printed Matter at retail windows would be fair or equitable?

Response: I am not proposing to make any classification changes. My understanding is that it is the Postal Service's view that Bound Printed Matter is a commercial product. Limiting payment options to those typically used by commercial mailers will help clarify our product offering.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
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DFC/USPS-T38-13. Please refer to your testimony at page 6, fn. 2. At present, does the Postal Service routinely suggest Media Mail to customers who bring large flats or parcels to the retail window?

Response: I am not testifying on retail operations, but my understanding is that Media Mail is, and will remain, an option for customers sending eligible parcels at retail windows.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS YEH
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T38-14. Please refer to your testimony at page 6, fn. 2. Please explain why the regulation described in your testimony would not cause undue or unreasonable discrimination among users of the mail within the meaning of 39 U.S.C. § 403(c).

Response: I am not a lawyer, so I cannot provide a legal opinion on the question you ask.