

**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-T39-43-47)**

**July 10, 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: July 10, 2006

DOUGLAS F. CARLSON

**DFC/USPS-T39-43.** Please refer to your response to DFC/USPS-T39-31.

Please provide the percentage of mail volume that is accepted in transactions at retail terminals that is accepted at a POS retail terminal.

**DFC/USPS-T39-44.** Please refer to your response to DFC/USPS-T39-33. For each part below, please confirm that, for some certified mail items to which a green Form 3811 return receipt was attached, the Postal Service may have obtained a signature on the return receipt and mailed the return receipt to the customer, but no electronic copy of the signature for the certified mail delivery record may exist because —

- a. The delivery employee failed to obtain a signature on the Form 3849;
- b. The bar code and human-readable numbers on the Form 3849 were not readable, therefore making it impossible for the signature to be linked to the appropriate mail piece.
- c. The signature may not have been captured at the Computerized Forwarding System site.

If you do not confirm, please explain.

**DFC/USPS-T39-45.** Please refer to your response to DFC/USPS-T39-33.

- a. Please explain why the scenario posed in DFC/USPS-T39-33 would be rare.
- b. Please confirm that the scenario posed in DFC/USPS-T39-33 conceivably could occur in every one of the 4.2 percent of instances in which an

electronic copy of the signature was not on file in the certified mail delivery record.

**DFC/USPS-T39-46.** Please refer to your response to DFC/USPS-T39-32(a).

- a. Please explain why your response includes the words “in isolation.”
- b. Please explain why you are not willing to state unequivocally that a 4.2-percent failure rate is unacceptable.
- c. Please provide the maximum failure rate that the Postal Service considers acceptable.

**DFC/USPS-T39-47.** Please refer to your response to DFC/USPS-T39-34.

Please confirm that the Postal Service performs no quality control or other monitoring to ensure that employees are properly collecting signatures on green Forms 3811 or properly returning green Forms 3811 to the sender. If you do not confirm, please explain.