

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-T23-13-19)  
(July 24, 2006)

The United States Postal Service hereby provides the responses of witness Page to the above listed interrogatories of Douglas F. Carlson, filed on July 10, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-13.** Please refer to your response to DFC/USPS-T23-6. Please provide a copy of the portion of "LR-B-5" that pertains to cost estimates for return receipt on which you rely or plan to rely in Docket No. R2006-1.

**RESPONSE:**

A copy of the entire LR-B-5 is attached. The most relevant pages pertaining to the window acceptance times on which I rely or plan to rely are pages 5, 10, and 14 of the attachment.

COST STUDY OF  
RETURN RECEIPTS  
AND  
RETURN RECEIPTS AFTER MAILING

Prepared by:  
Finance Department  
Review & Evaluation Division  
Cost/Benefit Evaluation Branch

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APPENDIX

1. Study Instructions

## I. PURPOSE

This study was initiated to determine those attributable costs incurred by the U. S. Postal Service in providing return receipts <sup>1/</sup> service "at time of mailing" and "after mailing."

The sender may request a return receipt, Form 3811, at the time of mailing or request a return receipt, Form 3811-A, after mailing. Form 3811 shows to whom and date delivered or to whom, date delivered and address of delivery.

Form 3811-A is used "after mailing" or in the event the sender has not received the Form 3811 he has paid for, he may, within one year of mailing, request a duplicate if he can produce a receipt for such payment. The duplicate provides the name of the person who signed for the article and date of delivery. No charge is made to the customer for this duplicate.

## II. STUDY SCOPE AND METHODOLOGY

The study effort was directed toward identifying and measuring attributable labor costs and other costs associated with the return receipt program. Work elements measured in the study include:

1. Acceptance of return receipts at all service windows.
2. Delivery of return receipts at all delivery points, i.e., carrier/motorized routes, box sections, etc. for purpose of obtaining customer's signature, date of delivery and address of delivery (if requested).
3. Review of return receipts by clearing clerk after data in item 2 above is obtained.
4. Search and review of postal records to ascertain delivery information requested by a customer and transcribing data onto the applicable forms.

Study data was obtained from 26 post offices in the five regions. The test period began August 7 and ended August 20, 1976.

## III. STUDY RESULTS

On a per-transaction basis, the study results indicate:

<sup>1/</sup>Applicable to registered, insured mail, certified and C.O.D.s.

- the nationwide average cost for return receipts "at time of mailing" to whom and date delivered is estimated at \$.289 (Table I).
- the nationwide average cost for return receipts "at time of mailing" to whom, date delivered and address of delivery is estimated at \$.368 (Table V).
- the nationwide average cost for return receipts - "after mailing" (excluding duplicates) is estimated at \$2.009 (Table IX).

#### IV. STUDY FACTS

##### A. Return Receipts "At Time of Mailing" - To Whom and Date Delivered

In providing regular service for return receipts, percentage of cost to the program is as follows:

Window Acceptance	26.7%
Carrier/Driver Delivery and Window Service	42.3%
Clerk Review of Return Receipts	8.3%
Carrier Waiting Time for Review of Return Receipts	8.0%
Printing Cost	1.0%
Cost of Returning Receipts Through Mailstream	10.0%
Additional Cost of Handling Duplicate Requests:	
Window Acceptance	1.0%
Review & Search	2.4%
Forwarding and Returning Receipts Through Mailstream	0.3%
	<u>3.7%</u>
	100.0%

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Each of the above work functions is described and measured in the following:

1. Window Transactions

At the originating post 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.

At the destination post office, the clerk reviews Form 3811, obtains the signature of the addressee or his authorized agent, enters date delivered and removes the form from the piece of mail to be returned to the sender.

2. Carrier/Driver Delivery

The carrier/driver, upon delivery, reviews the return receipt, obtains the signature of the addressee or his authorized agent, enters the date delivered and removes the form from the piece of mail. The carrier/driver returns the Form 3811 to a clearing clerk and waits until it is reviewed to ascertain all data is completed. The carrier/driver waiting time is chargeable to the return receipt program.

3. Clerk Review Time of Return Receipt

Before entering the receipts in the mailstream to be returned to the sender, the clearing clerk will review the carrier/driver return receipts for completeness, make any necessary corrections, stamp postmark and enter his initials.

4. Cost of Handling a Duplicate Request

Section 165.23 of the Postal Manual permits a mailer, after a reasonable period of time, to request a duplicate if he did not receive a paid return receipt. Although no charge is made to the customer for this service, this study has identified those processing costs associated with a duplicate.

The window clerk accepts and reviews Form 3811-A, return receipt-duplicate, with the customer, accepts the fee, attaches proper postage to the receipt and forwards the form to the destination post office.

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At the destination post office, the receipt is given to a clerk who is authorized to review postal records. A search and review is made of the records of delivery for date of delivery and name of individual who signed for the article. The clerk will enter the name, date of delivery, stamp post-mark, initial receipt, cross off destination's office address and re-enter the receipt into the mailstream.

If a signed receipt is not found for certified mail, Form 1572, Inquiry About Receipt of Mail, is forwarded to the addressee for a reply. Test results portray the total cost of handling duplicate requests represents only 3.7% of the total attributable unit cost.

5. Selection of Post Offices

Because of the small volume of return receipt transactions, 75.5 million annually 1/, offices to be tested were not randomly selected. Instead, using a judgement selection, offices were selected from the Cost Ascertainment Probability Sample, Table 4, Mail Category, using A/P's 3 and 6, FY-76, where sufficient transactions have been recorded.

It is our concerted opinion the test data submitted from the CAG A, B and C post offices participating in the study is adequate to develop a time estimate. The two-week test volume represents 6.8% of the total volumes of return receipt transactions for a two-week period.

B. Return Receipts "At Time of Mailing" - To Whom, Date and Address of Delivery

In this service, the percentage of cost to the program is as follows:

1/ Special Services Revenue and Transactions, FY-1975.

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Window Acceptance		16.3%
Carrier/Driver Delivery & Window Service		46.0%
Clerk Review of Return Receipt		13.6%
Carrier Waiting Time for Review of Return Receipt		13.3%
Printing Cost		0.8%
Cost of Returning Receipt Thru Mailstream		7.9%
Add'l Cost of Handling Duplicate Requests:		
Window Acceptance	0.5%	
Review and Search	<u>1.6%</u>	<u>2.1%</u>
Forwarding and Returning Receipts Through Mailstream		....
		<hr/>
	TOTAL PERCENT	100.0%

The reader should be cognizant that the procedures for this type of return receipt is identical to that outlined in Section A above, except it has the added feature of an address of delivery.

The increase in cost occurs with the carrier/driver or window clerk obtaining the address of delivery from the customer and the clearing clerk reviewing the address of delivery for completeness.

#### V. DESCRIPTION OF OTHER RETURN RECEIPT SERVICE - AFTER MAILING

As previously mentioned, Form 3811-A provides for information for a duplicate. Form 3811-A also provides a service of obtaining the name of the person who signed for the article and date delivered after an accountable piece of mail (registered, certified, C.O.D. or insured over \$15.00) has entered the mailstream at the originating post office.

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The clerk at the originating post office accepts and reviews Form 3811-A with the customer, accepts a fee, attaches postage and enters the receipt into the mailstream for the destinating post office. The destination clerk reviews the postal records to determine to whom delivery was made, date of delivery. Test results show this search and review time averages approximately six minutes a search and accounts for 57.0% of the total attributable unit cost (Table IX).

If a signed receipt is not found for certified mail during the search time, a Form 1572-Inquiry About Receipt of Mail is prepared for the addressee. The delivery information contained on Form 1572 is used to complete Form 3811-A. The completed 1572 is then filed with Form 3849 as a receipt. The total effort involving preparation of data, locating the appropriate 3811-A, transferring data onto another form and filing accounts for approximately 21% of the total attributable unit cost (Table IX).

TABLE -

RETURN RECEIPTS - 25c FEE  
SUMMARIZED ATTRIBUTABLE UNIT COST

<u>FUNCTION</u>	<u>Nationwide</u>		<u>Unit Cost</u>	<u>% Of Total Cost</u>
	<u>Volume</u>	<u>Total Cost</u>		
1. Window Acceptance	71,554	\$ 5,513	\$ .077	26.7%
2. Carrier/Driver Delivery and Call Window/Box Section Delivery	198,761	\$ 24,181	\$ .122	42.3%
3. Clerk Review of Return Receipt	198,761	\$ 4,718	\$ .024	8.3%
4. Carrier Waiting Time for Review of Return Receipts	198,761	\$ 4,591	\$ .023	8.0%
5. Printing Cost	198,761	\$ 597	\$ .003	1.0%
6. Cost of Returning Receipts Through Mailstream	198,761	\$ 5,803	\$ .029	10.0%
7. Additional Cost of Handling Duplicate Requests	198,761	\$ 630	\$ .003	1.0%
7A. Window Acceptance	198,761	\$ 1,423	\$ .007	2.4%
7B. Review and Search	198,761	\$ 110	\$ .001	0.3%
7C. Cost of Forwarding & Returning Receipts Through Mailstream	...	...	...	...
7D. Printing Cost	...	...	...	...
<b>TOTAL ATTRIBUTABLE UNIT COST</b>			<u>\$ .289</u>	<u>100.0%</u>

TABLE II

RETURN RECEIPTS - 25¢ FEE  
WINDOW ACCEPTANCE COST

<u>FUNCTION</u>	<u>TOTAL COST</u>
1. Number of Forms Accepted - Clerk Completing Form 3811	71,554
Time Per Acceptance	.4142
Total Time	29,640.62
Total Cost - \$.186/Min.	\$ 5,513
Average Cost Per Return Receipt	\$ .077

RETURN RECEIPT - 25¢ FEE  
CARRIER/DRIVER STREET/OFFICE COST

<u>FUNCTION</u>	<u>TOTAL COST</u>
2. <u>Street</u>	
Volume of Return Receipts	77,690
Total Time	65,175.35
Total Cost - \$.181/Min.	\$11,797
2. <u>Office</u>	
Volume of Return Receipts	40,879
Total Time	31,305.02
Total Cost - \$.181/Min.	\$ 5,666
TOTAL VOLUME OF RETURN RECEIPTS	118,569
TOTAL COST	\$17,463
3. <u>Clerk Review of Return Receipts</u>	
Volume	118,569
Total Time	25,365.14
Total Cost - \$ .186/Min.	\$4,718
4. <u>Carrier Waiting Time For Review of Return Receipt</u>	
Volume	118,569
Total Time	25,365.14
Total Cost - \$.181/Min.	\$4,591
5. <u>Printing Cost</u>	
\$.003 Per Receipt <u>1/</u>	\$355

1/ Government Printing Office

RETURN RECEIPTS - 25c FEE  
CLERICAL COST

<u>FUNCTION</u>	<u>TOTAL COST</u>
<u>2. Window Service</u>	80,192
Volume and Return Receipts at Box Sections and Call Windows	36,120.12
Total Time	\$ 6,718
Total Cost - \$.186	
<u>5. Printing Cost</u>	\$ 242
\$.003 Per Receipt <u>3/</u>	
<u>6. Cost of Returning Receipt Through Mailstream</u>	198,761
Volume	\$5,803
Total Cost - \$.0292 Each <u>2/</u>	
<u>7. Cost of Handling Duplicate Requests</u>	
<u>7A. Window Acceptance</u>	1,887
Volume <u>1/</u>	3,388.85
Total Time	\$ 630
Total Cost - \$.186/Min.	
<u>7B. Review and Search</u>	1,887
Volume <u>1/</u>	7,650.65
Total Time	\$ 1,423
Total Cost - \$.186/Min.	
<u>7C. Cost of Forwarding &amp; Returning Receipt</u>	1,877
Volume <u>1/</u>	\$ 110
Total Cost - \$.0584 Each <u>2/</u>	

1/ Non-Add Volume.

2/ RCA Annual Report FY-75 & Review and Evaluation Projection for FY-78.

3/ Government Printing Office.

TABLE V

FUNCTION	RETUR SUMMARY C		PTS - 45¢ FEE BUTABLE UNIT COST		UNIT COST	% Of TOTAL COST
	VOLUME	NATIONWIDE TOTAL COST	VOLUME	NATIONWIDE TOTAL COST		
1. Window Acceptance	9,870	\$ 595			\$ .060	16.3%
2. Carrier/Driver and Call Window/ Box Section Delivery	16,816	\$ 2,836			\$ .169	46.0%
3. Clerk Review of Return Receipts	16,816	\$ 846			\$ .050	13.6%
4. Carrier Waiting Time for Review of Return Receipts	16,816	\$ 823			\$ .049	13.3%
5. Print Cost	16,816	\$ 50			\$ .003	0.8%
6. Cost of Returning Receipts Through Mailstream	16,816	\$ 491			\$ .029	7.9%
7. Additional Cost of Handling Duplicate Requests						
7.A. Window Acceptance	16,816	\$ 38			\$ .002	0.5%
7.B. Review and Search	16,816	\$ 97			\$ .006	1.6%
7.C. Cost of Forwarding & Returning Receipts Through Mailstream	16,816	\$ 8			----	----
7.D. Printing Cost	----	----			----	----
TOTAL ATTRIBUTABLE UNIT COST					\$ .368	100.0%

TABLE VI

RETURN RECEIPTS - 45¢ FEE  
WINDOW ACCEPTANCE COST

<u>FUNCTION</u>	<u>TOTAL COST</u>
1. Number of Forms Accepted-Clerk Completing Forms 3811	9,870
Time Per Acceptance	.3235
Total Time	3,192.75
Total Cost - \$.186/Min.	\$ 595

RETURN RECEIPT - 25¢ FEE  
CARRIER/DRIVER STREET/OFFICE COST

TABLE VII

<u>FUNCTION</u>	<u>TOTAL COST</u>
2. <u>Street</u>	
Volume of Return Receipt	8,572
Total Time	8,072.63
Total Cost - \$.181/Min.	\$ 1,461
2. <u>Office</u>	
Volume of Return Receipts	4,587
Total Time	5,151.55
Total Cost - \$.181/Min.	\$ 932
TOTAL VOLUME OF RETURN RECEIPTS	13,159
TOTAL COST	\$ 2,393
3. <u>Clerk Review of Return Receipt</u>	
Volume	13,159
Total Time	4,549.07
Total Cost - \$.186/Min.	\$ 846
4. <u>Carrier Waiting Time For Review Of Return Receipt</u>	
Volume	13,159
Total Time	4,549.07
Total Cost - \$.181/Min.	\$ 823
5. <u>Printing Cost</u>	
\$.003 Per Receipt <u>1/</u>	\$ 39

1/ Government Printing Office

RETURN RECEIPTS - 45¢ FEE  
CLERICAL COSTS

TABLE VIII

<u>FUNCTION</u>	<u>TOTAL COST</u>
<u>2. Window Service</u>	
Volume of Return Receipts at Box Sections and Call Windows	3,657
Total Time	2,378.67
Total Cost - \$.186/Min.	\$ 443
<u>5. Printing Cost</u>	
\$.003 Per Receipt <u>3/</u>	\$ 11
<u>6. Cost of Returning Receipt Through Mailstream</u>	
Volume	16,816
Total Cost - \$.0292/Each <u>2/</u>	\$ 491
<u>Cost of Handling Duplicate Requests</u>	
<u>.A. Window Acceptance</u>	
Volume <u>1/</u>	129
Total Time	202.47
Total Cost - \$.186/Min.	\$ 38
<u>7B. Review and Search</u>	
Volume <u>1/</u>	129
Total Time	523.10
Total Cost - \$.186/Min.	\$ 97
<u>7C. Cost of Forwarding &amp; Returning Receipts</u>	
Volume <u>1/</u>	129
Total Cost - \$.0584/Each <u>2/</u>	\$ 8

1/ Non-Add Volume.

2/ RCA Annual Report FY-75 and Review and Evaluation Division Projection For FY-78.

3/ Government Printing Office.

RETURN RECEIPT AFTER MAILING - 45¢ FEE  
SUMMARY OF ATTRIBUTABLE UNIT COST

TABLE IX

<u>FUNCTION</u>	<u>NATIONWIDE</u>		<u>UNIT</u> <u>COST</u>	<u>% OF</u> <u>TOTAL COST</u>
	<u>VOLUME</u>	<u>TOTAL COST</u>		
1. Window Acceptance Cost	1,260	\$ 480	\$ .381	19.0%
2. Search and Review Time	1,260	\$1,436	\$1.140	56.7%
3. Preparation and Review of Forms 1572 - Inquiry About Receipt Of Mail	1,260	\$ 537	\$ .426	21.2%
4. Printing Cost	1,260	\$ 5	\$ .004	0.2%
5. Cost of Forwarding/Returning Receipt Through Mailstream	1,260	\$ 73	\$ .058	2.9%
<u>TOTAL UNIT COST</u>			<u>\$2.009</u>	<u>100.0%</u>

RETURN RECEIPT AFTER MAILING - 45c FEE  
WINDOW ACCEPTANCE COST

TABLE X

<u>FUNCTION</u>	<u>TOTAL COSTS</u>
1. Volume of Return Receipts Accepted After Mailing	1,260
Total Acceptance Time	2,580.06
Total Cost - \$.186/Min.	\$480

RETURN RECEIPT AFTER MAILING - 45c FEE  
CLERK SEARCH & REVIEWING COST

TABLE XI

<u>FUNCTION</u>	<u>TOTAL COST</u>
<u>2. Search and Review Time</u>	
Volume of Return Receipts After Mailing	1,260
Total Search and Review Time	7,717.71
Total Cost - \$.186/Min.	\$ 1,436.00
<u>3. Preparation &amp; Review of Form 1572</u>	
Volume Form 1572s, Inquiry About Receipt of Mail <u>1/</u>	296
Total Time	2,885.00
Total Cost - \$.186/Min.	\$ 537
4. Printing Cost Per Receipt @ \$.0041 Ea. <u>2/</u>	\$ 5
5. Cost of Forwarding/Returning Receipt Through Mailstream @ \$.0584 Ea. <u>3/</u>	\$ 73

1/ Non-Add Volume.

2/ Government Printing Office

3/ RCA Annual Report FY-76 and R&ED Projection for FY-78.

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

- DFC/USPS-T23-14.** Please refer to your response to DFC/USPS-T23-8(e).
- a. Please confirm that the cost study on which you rely for estimating the window-acceptance costs of electronic return receipt is a study that was updated in Docket No. R2005-1. If you do not confirm, please explain.
  - b. Please confirm that the cost study in Docket No. R2005-1 was based on observations of the window-acceptance time for green Form 3811 electronic return receipts, not electronic return receipts. If you do not confirm, please explain.
  - c. Please provide data from a Postal Service data system that shows the number of electronic return-receipt transactions that occurred at each postal facility that the person who conducted the cost study on electronic return receipt visited during the times — or, if times are not available, the days — when he/she visited those facilities. Your response should include separate data for each facility. Please either identify each facility by name and ZIP Code or provide the Postal Service district in which the facility is located.

**RESPONSE:**

- a. Confirmed, but the window acceptance times were not updated.
- b. Confirmed, assuming you meant to refer to green card Form 3811 return receipts.
- c. The data are not available.

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-15.** Please refer to your response to DFC/USPS-T23-8(g), where you state that you did not use raw data for estimating window acceptance time associated with electronic return receipt. Please explain precisely how the time estimate of 0.414 minutes for window acceptance of an electronic return receipt was derived. For example, if the time is equal to the time for a green Form 3811 return receipt plus an additional amount of time for an electronic return-receipt transaction, your response should include this explanation.

**RESPONSE:**

The 0.414 minutes is the transaction time developed in the 1977 study for the green card, with no adjustments. See the attachment to DFC/USPS-T23-13, page 10.

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-16.** Please refer to your testimony at page 14, lines 22–26 and page 15, lines 1–4. Please explain precisely how the “transaction time greater than that used for traditional return receipts” was derived and whether any cost study underlying this “greater” transaction time was conducted for this docket or a prior docket.

**RESPONSE:**

See my responses to DFC/USPS-T23-3 and 15.

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-17.** Please provide a copy of Form 3811-A and Form 3811-I.

**RESPONSE:**

A copy of Form 3811-A is attached. A copy of Form 3811-I was included in witness Berkeley's response to DFC/USPS-T39-20.

# Request for Delivery Information/Return Receipt After Mailing

**INSTRUCTIONS FOR USE:**

**Accepting Office**

1. *Internal Use Only.* Help the customer complete Section 2 of this form and carefully compare it to the customer's receipt. Complete the shaded portions in Section 1.
2. Collect fees if required.
3. Select ONE of the following two options:
  - A.  If the item was mailed to an office using electronic record management (all offices in the U.S., including Alaska, Puerto Rico, and the Virgin Islands), choose one of the following two options:
    - If your office has Intranet access, use the Intranet to generate the request via fax, mail, or e-mail.
    - If your office does not have Intranet access, send this entire form, with Sections 1 and 2 completed, to a designated inquiry location.
 If electronic record is found, request the record electronically and discard this form. If the electronic record is not found, manually complete Section 3 and mail to the customer.
  - B.  If the item was mailed to an office using manual record management (refer to POM Part 619 for full listing), send this entire form, with Sections 1 and 2 completed, to the delivery office.

**Delivery Office - Use Only for Manually Filed Delivery Record Inquiries (3B checked above)**

1. If the fee is not attached or the form is not postmarked to show that the fee was paid at the time of the mailing, return this form to the accepting office.
2. Complete the items in Section 3 below. Enter the delivery information or indicate the reason for no information.
3. After completion, detach and insert the bottom portion of this document in an envelope addressed to the requestor and deposit it in the mailstream. Discard the remaining portion.

<b>Section 1</b>	Accepting Office: Postmark if Return Receipt fee was paid at time of mailing.	<input type="checkbox"/> Return Receipt fee WAS paid at time of mailing. (Customer has provided receipt. Postmark where indicated at left.) <input type="checkbox"/> Return Receipt fee WAS NOT paid at time of mailing. (Attach fee below.)  <p style="text-align: center;"><i>Attach fee here if applicable</i></p>
	Accepting Office City/State/ZIP Code™: _____	

**Delivery Office/Manual Inquiries:** Detach at dotted line and return bottom portion to customer when inquiry is resolved — discard remainder of form. **Electronic Inquiries:** Generate request from Intranet and discard the entire form if record is found.

<b>Section 2</b>	<b>A. TYPE OF SERVICE</b>	<b>C. ARTICLE INFORMATION</b>
	<input type="checkbox"/> Certified Mail™ <input type="checkbox"/> Numbered Insured <input type="checkbox"/> COD <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Express Mail® <input type="checkbox"/> Return Receipt for Merchandise	Article Number _____  Mailing Date (mm/dd/yy) _____
	<b>B. ARTICLE ADDRESSED TO</b>	<b>D. REQUESTOR</b>
	Addressee Name _____  Addressee Address _____ (No., street, apt./ste. no.) _____  (City, state, ZIP Code™) _____	Requestor Name _____  Requestor Address _____ (No., street, apt./ste. no.) _____  (City, state, ZIP Code) _____  Fax Number (Include area code) or email address (Complete ONLY if an electronic inquiry) _____

<b>Section 3</b>	<b>For Delivery Office Use Only</b>	Delivered to the following individual, company or organization	Delivery Office Postmark
	Postal Service records show no delivery information because:	Delivery Date	
	<input type="checkbox"/> Record not found <input type="checkbox"/> Forwarded (date: _____) <input type="checkbox"/> Returned (date: _____)	Delivery Address (if different from address in section 2B)	

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-18.** Please explain precisely how the time estimate of 0.307 minutes for window acceptance of a return receipt was derived.

**RESPONSE:**

Please see my response to DFC/USPS-T23-6.

RESPONSE OF POSTAL SERVICE WITNESS PAGE  
TO INTERROGATORY OF DOUGLAS F. CARLSON

**DFC/USPS-T23-19.** Please refer to the response to DFC/USPS-T39-14.

- a. Do return receipts that are not accepted at a retail window incur any window-acceptance costs? If yes, please explain.
- b. Please confirm that the time estimate of 0.307 minutes for window acceptance of a return receipt is a weighted-average that considers the substantial percentage of return receipts that are not accepted at a retail window. If you do not confirm, please explain.
- c. Please provide the time estimate for window acceptance of a return receipt that actually is accepted at the retail window.

**RESPONSE:**

- a. No, although there might be some acceptance costs for such return receipts.
- b-c. With respect to the 0.307 minutes time, please see my response to DFC/USPS-T23-6. The only time estimates I have for window acceptance of a return receipt are from LR-B-5, and the only information I have from LR-B-5 is the attachment to DFC/USPS-T23-13. The methodology I used to develop window costs for return receipts is the same as has been used since Docket No. R77-1, and has been adopted by the Commission to establish the basis for return receipt fees in each rate case.