

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-T39-43-47)

The United States Postal Service hereby files the responses of witness Berkeley (USPS-T-39) to the above-listed interrogatories, 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:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-43-47)**

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.

RESPONSE:

The Postal Service does not collect data on the mail volume that is accepted in transactions at retail terminals that are not on the POS system. The Postal Service collects data on the mail volume accepted in transactions at retail terminals on the POS system only. Therefore, I am unable to provide the percentage requested.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-43-47)**

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.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-43-47)**

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.

RESPONSE:

a. The scenario would be rare because the host special service, in this case certified mail, would be the “driver” of the process; that is, the reason the delivery employee is initially seeking a signature. Therefore, the delivery employee, as a matter of habit and training, would be focused on the host special service first and then the ancillary service, with the possible exception of restricted delivery because that ancillary service dictates who would sign for the accountable piece to begin with, and thus must be focused on before the host service.

b. It is possible, but not probable, since there are other reasons for a signature not to be on file. Please see my response to DFC/USPS-T39-32.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-43-47)**

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.

RESPONSE:

a. The words “in isolation” referred to two things. First, the fact that the mailpieces had a final disposition scan (i.e., a delivery)but no signature on file does not necessarily mean that a signature was not captured. Perhaps the signature was obtained but not on file for some reason beyond the Postal Service’s control. Second, most electronic return receipt customers do not ask for the signature image. It is possible that of those customers requesting a signature image, less than 4.2 percent of all electronic return receipt transactions not having a signature on file could mean less than 4.2 percent of those customers actually requesting a signature image find it was not captured. The fact is that the Postal Service does not consider any failure rate acceptable and is continually working towards improvements (see my response to c below).

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Response to DFC/USPS-T39-46 (Continued)

b. I did state it unequivocally since the “in isolation” was in parentheses. Please see my response to a. above.

c. There is no established maximum failure rate as the Postal Service continually works to reduce any failure rates as much as possible.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-43-47)**

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.

RESPONSE:

Not confirmed. Employees throughout the Postal Service perform quality control or other monitoring to see if signatures are collected on green card return receipts, that green cards are fully or properly completed, and that green cards are returned to the sender. There is not a formal quality control or monitoring program; however, I believe most employees are diligent when it comes to making sure they are doing what is required to carry out their jobs.