

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-T23-20-23)
(August 8, 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 25, 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 POSTAL SERVICE WITNESS PAGE
TO INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T23-20. Please refer to your testimony at page 14, lines 22–26 and page 15, lines 1–4 and to your response to DFC/USPS-T23-16.

- a. Please provide the transaction time for window acceptance of green Form 3811 return receipts.
- b. Please provide the transaction time for window acceptance of electronic return receipts.

RESPONSE:

- a. The window transaction times I use for form 3811 are .414 minutes (Return Receipt - Whom and Date Delivered) and .324 minutes (Return Receipt - Whom, Where, and Date Delivered).
- b. The window transaction time I use for Electronic Return Receipt is .414 minutes.

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DFC/USPS-T23-21. Please refer to your response to DFC/USPS-T23-14(c).

- a. Please explain why the data are not available.
- b. Please provide the number of postal facilities that the person who conducted the study on window acceptance times on electronic return receipt visited and how many hours the person spent observing transactions at each facility.

RESPONSE:

- a. A window transaction cost study for electronic return receipt has not been conducted, to the best of my knowledge.
- b. The transaction study I rely on for the electronic return receipt proxy was conducted for Docket No. R77. The only information I have from that study is in the attachment to my response to DFC/USPS-T23-13, which states on page 3 that data were obtained from 26 post offices during a two-week period.

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DFC/USPS-T23-22. When will you file the errata described in your response to DFC/USPS-T23-6?

RESPONSE:

These errata will be filed by August 11, 2006.

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DFC/USPS-T23-23. Please identify all numbers and words in USPS-LR-L-59 on which you do not plan to rely, and please provide the correct numbers and words.

RESPONSE:

Please see the errata to LR-L-59, to be filed by August 11, 2006. Basically, the only changes are to the window transaction times. In Workbook "Return Receipt", Tab RR-1, cell H10 changes from 0.307 to 0.414, and Tab RR-2, cell H10 changes from 0.307 to 0.324. These changes affect other cells on those tabs, as well as the results in Tab RR-Avg.