

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH
(DFC/USPS-T38-15-18)**

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson, filed on August 10, 2006, and redirected from witness Yeh: DFC/USPS-T38-15-18.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 21, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-15. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain how the Postal Service will respond if a customer brings a parcel to a retail window that does not already have postage applied and if the customer requests to send the parcel at the rate for single-piece Bound Printer Matter. Assume that the customer does not desire any special services and that the item qualifies as Bound Printed Matter.

RESPONSE:

The specific procedures have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-16. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain whether a PVI strip or label from a retail terminal is a valid form of postage payment.

RESPONSE:

The intention of the change is to require that postage be pre-applied by the customer.

Therefore, there would be no need for the customer to be given a PVI strip, although the specific procedures applicable to various scenarios that might be envisioned have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-17. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain how the Postal Service will respond if (1) a customer brings a parcel to a retail window that does not already have postage applied, (2) the customer requests to send the parcel at the rate for single-piece Bound Printer Matter, and (3) the customer informs the clerk of the amount of postage that he needs. Assume that the customer does not desire any special services and that the item qualifies as Bound Printed Matter. In your response, please specifically identify the types of postage-payment methods that the Postal Service may offer the customer and that the customer may request.

RESPONSE:

The specific procedures have not yet been developed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS F. CARLSON
REDIRECTED FROM WITNESS YEH**

DFC/USPS-T38-18. Please refer to your revised testimony filed on August 10, 2006, at page 6, fn. 2. Please explain why the Postal Service cannot achieve its goal of clarifying parcel offerings by retaining Bound Printed Matter rates in the POS system and simply suppressing display of this service option unless a customer, communicating via the window clerk, specifically requests this service.

RESPONSE:

The Postal Service's ultimate goal is to clarify that Bound Printed Matter is a commercial offering, which would therefore not be provided through the retail window or need to be included in retail sales systems. Given the issues raised, the revised footnote represents a significant, but partial, step toward that goal. Further consideration will be given as to the appropriate way to accomplish the goal fully.