

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--56-57)

The United States Postal Service hereby files the responses of witness Berkeley (USPS-T-39) to the above-listed interrogatories, filed on August 22, 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

David H. Rubin
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
September 5, 2006

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-56-57)**

DFC/USPS-T39-56. Please refer to the responses to DFC/USPS-T39-2, 48, and 51. Please confirm that the Postal Service has no data to support your claim that electronic return receipt provides customers quicker access to the recipient's signature than a green Form 3811 return receipt. If you do not confirm, please provide the data.

RESPONSE:

While the Postal Service does not collect data on the speed with which customers receive delivery information from return receipt service, my knowledge of how electronic return receipt service works suggests that the scanning event and the downloading of this event will provide quick access to the signature. Therefore, this type of return receipt service generally should provide quicker access to the recipient's signature than the green card service, even though this is not measured in quantitative terms by the Postal Service. The green card needs to be mailed back to the customer and, therefore, does not have the potential to provide the signature right after it is added to the central database, like the electronic return receipt does.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BERKELEY TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T39-56-57)**

DFC/USPS-T39-57. Please refer to the responses to DFC/USPS-T39-2, 48, and 51. Please confirm that the Postal Service has no data to support your claim that electronic return receipt provides access to the recipient's signature "at any time right after the delivery takes place." If you do not confirm, please provide the data.

RESPONSE:

Please see my response to DFC/USPS-T39-56 above. Additionally, the reference to "at any time" was part of a sentence containing "and access to this information on-line at any time." I meant that anyone could conceivably access the usps.com website on the Internet at any time of the day or night.