Postal Rate Commission
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BEFORE THE

POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2006 **Docket No. R2006-1**

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES TO THE
UNITED STATES POSTAL SERVICE
(DFC/USPS-80–81)

November 3, 2006

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit these follow-up interrogatories to the United States Postal Service.

The instructions accompanying DFC/USPS-T34-1–4 are incorporated herein by reference.

Respectfully submitted,

Dated: November 3, 2006 DOUGLAS F. CARLSON

DFC/USPS-80. Please refer to the response to DFC/USPS-78(c), the sentence "Once purchased, the Stamp may be used for first-ounce letter postage at any time in the future, regardless of the prevailing rate at the time of use" that witness Taufique proposed for DMCS section 241, and proposed DMM section 604.1.10, which appears in the notice published at 71 Fed. Reg. 56,587 on September 27, 2006.

a. Please confirm that the Postal Service interprets the sentence quoted in the opening paragraph of this interrogatory as providing that the postage value of each "Forever Stamp" is the current First-Class Mail single-piece one-ounce letter rate. If you do not confirm, please explain.

b. Please confirm that proposed DMCS section 241 could reasonably and properly be interpreted to permit customers to use a "Forever Stamp" on First-Class letters only, to the exclusion of other classes or shapes of mail. If you do not confirm, please explain.

c. Please discuss the extent to which the Postal Service believes that proposed DMCS section 241 does or does not permit the Postal Service to restrict the use of the "Forever Stamp" to First-Class letters.

DFC/USPS-81. Please refer to the response to DFC/USPS-79(b).

a. Please confirm that the DMCS language proposed in DFC-T-1 is fully consistent with the *actual use* of the "Forever Stamp" that the Postal Service proposes to allow or "tolerate." For purposes of this interrogatory,

the term “actual use” is distinct from “intended use” and does not encompass issues related to intended use.

b. Please confirm that the only difference, for purposes of resolving the issues in this proceeding, between the responses to DBP/USPS-340 and 341 and the DMCS language proposed in DFC-T-1 is that DFC-T-1 proposes that the intended purpose of the Forever Stamp be for use on all mail classes, while in contrast the Postal Service’s interrogatory responses emphasize that the intended use of the “Forever Stamp” is on one-ounce single-piece First-Class Mail letter-shaped pieces and that other uses will be tolerated but not encouraged. If you do not confirm, please explain the other differences between the responses to DBP/USPS-340 and 341 and the DMCS language proposed in DFC-T-1.