

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**DOUGLAS F. CARLSON
RESPONSE TO INTERROGATORY OF
DAVID B. POPKIN
(DBP/DFC-T1-1)**

October 26, 2006

I hereby provide my response to the interrogatory of David B. Popkin (DBP/DFC-T1-1), which Mr. Popkin filed on October 19, 2006. I have provided the original text of the interrogatory followed by my response.

Respectfully submitted,

Dated: October 26, 2006

DOUGLAS F. CARLSON

RESPONSE OF DOUGLAS F. CARLSON
TO INTERROGATORY OF DAVID B. POPKIN

DBP/DFC-T1-1. Please refer to your response to Interrogatory USPS/DFC-T1-12. For your mailings on September 15, 18, and 19, 2006, how many days elapsed between the date of delivery and the date on which the Postal Service provided the recipient's signature to you? Please provide both an average and a maximum.

RESPONSE:

The average time for the Postal Service to provide the signature to me by e-mail was 4.59 to 5.74 days after delivery.

I am providing a range because of a feature of the Postal Service's Web tracking system. When customers request a Proof of Delivery letter at the Postal Service's Web site, the Postal Service will provide the Proof of Delivery letter almost immediately if the signature has been scanned and attached to the electronic delivery record. Otherwise, the Postal Service holds the request in a pending status for seven days. If the signature is not on file after seven days, the Postal Service sends a Proof of Delivery letter reporting that no signature is on file.

Signatures sometimes show up more than seven days after delivery. For this study (and previous ones described in my testimony), I need to continue monitoring delivery records to determine whether signatures eventually arrive. Unfortunately, if a customer submits a new request for a Proof of Delivery letter more than seven days after delivery, the system provides a Proof of Delivery letter immediately. If no signature is available at the moment the request arrives, the Postal Service immediately sends another Proof of Delivery letter indicating that no signature is on file. Thus, when I receive the first Proof of Delivery letter indicating that no signature is on file, I cannot submit a new request and expect it to be held in a convenient pending status for seven days. Consequently, to calculate the time required to provide the signature, I would have needed to submit a request for a Proof of Delivery letter every day (for perhaps 20 or more items). This approach would have been impractical.

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As an alternative, I first recorded the number of days after delivery during which a signature initially was not available (X). (The initial value for X usually was 7.) Next, I submitted a new request for a Proof of Delivery letter several days later (Y days after delivery). If the signature was immediately available, I knew that the signature became available between X and Y days after delivery. I sometimes performed this routine for two to four rounds after delivery, each time updating my value for X.

In the end, 16 signatures arrived so late that I knew only the range of days required for the signature to be available (X to Y). The range of days for these signatures was 7 to 22. I arrived at the lower average of 4.59 days for the entire mailing by using the low end of the range (X) for each late signature, and I arrived at the higher average of 5.74 days by using the high end of the range (Y) for each late signature. The true average probably is somewhere in the middle.

The longest definitive, confirmed number of days to provide a signature was 14. Seven signatures definitely did not show up for 10 days or more.

The median number of days to delivery was four.