

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DOUGLAS CARLSON INTERROGATORIES (DFC/USPS-7 AND 11)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson dated May 1, 2006: DFC/USPS-7 and 11. Each interrogatory is started verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON**

**DFC/USPS-7.** Please refer to the response to DFC/USPS-4. Please provide all documents, from any level in the Postal Service, relating to the Postal Service's consideration, evaluation, or assessment of the extent to which a change in any collection times from 5:00 PM to 4:00 PM in the 983, 984, or 985 ZIP Code area would or would not meet the needs or requirements of the community or conform to the Postal Service's national service standards for collections.

**RESPONSE**

The only changes made in connection with the Olympia AMP were in the 985 zone. The Postal Service has located no responsive documents.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DOUGLAS CARLSON**

**DFC/USPS-11.** Suppose plant A processes outgoing mail on weekdays, but on Saturdays, plant A sends its mail to plant B for processing. Do any situations exist in which the First-Class Mail service standard from the service area of plant A to a particular three-digit ZIP Code is two days, but the First-Class Mail service standard to the same three-digit ZIP Code from the service area of plant B is three days?

**RESPONSE**

In its May 8<sup>th</sup> objection to DFC/USPS-10, the Postal Service indicated that it did not maintain a centralized, updated listing of where Saturday consolidations may be in place. Accordingly, it is impossible -- in the absence of such information, and without canvassing the entire postal network to identify all Saturday consolidations, and comparing service standards on a plant-by-plant basis -- to determine whether such a scenario might exist.