

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

**Experimental Priority Mail  
Flat-Rate Box, 2004**

**Docket No. MC2004-2**

**DOUGLAS F. CARLSON  
INTERROGATORIES TO THE  
UNITED STATES POSTAL SERVICE  
(DFC/USPS-1-6)**

**June 21, 2004**

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

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all

documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

Dated: June 21, 2004

DOUGLAS F. CARLSON

**DFC/USPS-1.** Please provide the percentage reduction in weekly retail window-service hours nationwide since January 1, 2000.

**DFC/USPS-2.** Please provide the number of postal facilities that have parcel chutes or other collection receptacles that will allow customers to deposit either of the proposed Priority Mail flat-rate boxes.

**DFC/USPS-3.** Please discuss the extent to which customers would be able to deposit postage-paid Priority Mail boxes at post offices without entering the queue for retail window service.

**DFC/USPS-4.** For FY2003, please provide the total number of shipping labels printed with postage and the total number of shipping labels printed without postage at *www.usps.com* for each combination of Priority Mail zone and weight increment.

**DFC/USPS-5.** If a rate less than \$7.70 for the Priority Mail flat-rate box were approved, please confirm that the Postal Service would have the ability to issue and sell a postage stamp in the exact denomination of the new rate.

**DFC/USPS-6.** Please provide all facts and information estimating, identifying, or describing the value of the flat-rate aspect of the Priority Mail flat-rate envelope and the value of the flat-rate aspect of the Express Mail flat-rate envelope.