

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

Postal Rate and Fee Changes, 2005

Docket No. R2005-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-54-60)**

May 19, 2005

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

The instructions contained in my interrogatories DFC/USPS-1-19 are incorporated herein by reference.

Respectfully submitted,

Dated: May 19, 2005

DOUGLAS F. CARLSON

DFC/USPS-54. Please refer to the response to DFC/USPS-28. For each quarter in FY 2002, FY 2003, and FY 2004, please provide the overall overnight, two-day, and three-day EXFC scores and the overnight, two-day, and three-day EXFC scores for mail not destined to post-office boxes.

DFC/USPS-55. Please refer to the response to DFC/USPS-28. Please explain why service performance to post-office boxes differs from service performance to addresses other than post-office boxes, and please provide documents describing plans or efforts to address this disparity.

DFC/USPS-56. Please refer to the response to DFC/USPS-13. Please estimate the percentage of addresses during the time when Docket No. R2000-1 was being litigated to which the Express Mail network was designed to deliver Express Mail on Sundays and holidays.

DFC/USPS-57.

- a. Please confirm that Express Mail sent between some addresses is not transported by air.
- b. Please describe the characteristics of the situations in which Express Mail sent between some addresses is not transported by air.
- c. Please confirm that Express Mail sent between some addresses is transported by commercial airplanes not operated by FedEx.

- d. Please describe the characteristics of the situations in which Express Mail sent between some addresses is transported by commercial airplanes not operated by FedEx.
- e. Please explain why the limitations of the FedEx network would cause the Postal Service to cease delivering all Express Mail on Sundays and holidays in some ZIP Codes containing street addresses if some of the Express Mail would be transported without using FedEx airplanes even if the FedEx network were in operation on the applicable day of the week.
- f. Please explain how the Postal Service transports Express Mail to the ZIP Codes for which the Postal Service still provides delivery of Express Mail on Sundays and holidays.
- g. Please explain how the Postal Service decided in which ZIP Codes to discontinue delivery of Express Mail on Sundays and holidays and in which ZIP Codes to continue delivery of Express Mail on Sundays and holidays.
- h. Please provide documents relating to the Postal Service's determination of the public's need for Express Mail delivery on Sundays or holidays.
- i. Please provide documents relating to or discussing the effect on the public of a reduction in the number of ZIP Codes to which Express Mail would be delivered on Sundays and holidays.
- j. Please identify alternatives to Express Mail for the public to use to achieve delivery of mail on Sundays and holidays.

DFC/USPS-58. Please refer to the response to DFC/USPS-13.

- a. For an average origin ZIP Code on a weekday mailing date that does not immediately precede a holiday, please provide the average number of ZIP Codes to which Next Day Service is available.
- b. For an average origin ZIP Code on a Saturday mailing date, please provide the average number of ZIP Codes to which Next Day Service is available.
- c. For an average origin ZIP Code on a weekday mailing date that does not immediately precede a holiday, please provide the average number of addresses to which Next Day Service is available.
- d. For an average origin ZIP Code on a Saturday mailing date, please provide the average number of addresses to which Next Day Service is available.

For this interrogatory, data for an average origin ZIP Code may be calculated by adding the number of ZIP Codes to which Next Day Service is available for each origin ZIP Code nationwide and then dividing this sum by the total number of ZIP Codes. If a different calculation is used to define an average origin ZIP Code, please explain the calculation.

DFC/USPS-59. Please refer to the response to DFC/USPS-6. Please explain whether Express Mail is considered delivered on-time to a post-office box if a signature for the item is required and if the Postal Service places a notice of attempted delivery, such as a Form 3849, in the customer's post-office box after the last time on that day in which the Postal Service provides retail or other service that would allow the customer to pick

up the item (e.g., a delivery attempt at 2:20 PM in a post office whose retail window and pick-up services ended at 2:00 PM).

DFC/USPS-60. Please refer to the response to DFC/USPS-13. Please estimate the percentage of ZIP Codes during the time when Docket No. R2000-1 was being litigated to which the Express Mail network was designed to deliver Express Mail on Sundays and holidays.