

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

RECEIVED
SEP 27 4 12 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-1-13)

September 25, 2001

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

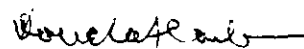
whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"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,



DOUGLAS F. CARLSON

Dated: September 25, 2001

DFC/USPS-1. Please provide a listing of all Postal Inspection Service or Office of the Inspector General audits that either unit has conducted since January 1, 2000.

DFC/USPS-2. Please provide reports from all Postal Inspection Service or Office of the Inspector General audits that have been conducted on Express Mail, Priority Mail, Certified Mail, Registered Mail, Insured Mail, Return Receipt, Post Office Box, or retail window service, or on stamped cards, since January 1, 2000. If any audit reports are filed as a library reference, pursuant to Rule 31(b)(2)(ix) I request that a copy of these audit reports be mailed directly to me.

DFC/USPS-3. For each of the past three years, please provide all information that is available in summary form about the types of service problems that customers have brought to the attention of the Postal Service using a Consumer Service Card.

DFC/USPS-4. Aside from Consumer Service Card data, please discuss the systems and processes that the Postal Service uses to collect and compile statistics on service complaints from customers.

DFC/USPS-5. For each of the past three years, and for each category or type of First-Class Mail (excluding Priority Mail) for which the Postal Service collects data, please provide nationwide data from EXFC, ODIS, and any other applicable systems showing:

- a. The percentage of the time that mail is delivered within the number of days specified by the applicable service standard;
- b. The average number of days to delivery.

DFC/USPS-6. For each of the past three years, and for each category or type of Priority Mail for which the Postal Service collects data, please provide nationwide data from PETE, ODIS, and any other applicable systems showing:

- a. The percentage of the time that mail is delivered within the number of days specified by the applicable service standard;
- b. The average number of days to delivery.

DFC/USPS-7. Please provide documents that explain the operation of the EXFC, PETE, and ODIS systems and the methodology for calculating days to delivery and on-time percentages.

DFC/USPS-8. Please explain the extent to which EXFC scores for overnight, two-day, and three-day First-Class Mail delivery and PETE scores for Priority Mail delivery directly affect postal managers' compensation.

DFC/USPS-9. For each type of retail terminal, please discuss with specificity the extent to which these terminals provide correct information to customers or postal employees on the service standards for First-Class Mail and Priority Mail.

DFC/USPS-10. Please list and describe all the packaging materials that the Postal Service provides for Priority Mail.

DFC/USPS-11. Please provide all facts and information indicating that postal employees are or are not properly completing Form 3811, Domestic Return Receipt.

DFC/USPS-12. Please provide all information concerning time to delivery and other aspects of delivery performance that is or may be available from an analysis of data collected from the scanning of bar-coded labels for Express Mail, Certified Mail, Registered Mail, Insured Mail, Return Receipt for Merchandise, Delivery Confirmation, and Signature Confirmation.

DFC/USPS-13. Please provide data describing the extent to which delivery employees scan Delivery Confirmation bar codes. Also, please identify the measurement system.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the United States Postal Service in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

September 25, 2001
Santa Cruz, California