

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOSEPH D. MOELLER
(DFC/USPS-T28-1-6)

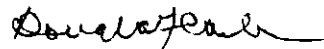
September 28, 2001

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

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories DFC/USPS-1–13 are incorporated herein by reference.

Respectfully submitted,



Dated: September 28, 2001

DOUGLAS F. CARLSON

DFC/USPS-T28-1. Please explain whether the value of First-Class Mail service has increased, decreased, or remained the same in the past five years. In responding, please provide all documents that support your response.

DFC/USPS-T28-2.

- a. Please confirm that the Postal Service changed service standards for First-Class Mail in 2000 and 2001. If you do not confirm, please explain.
- b. Please provide the approximate volume of First-Class Mail that, as a result of the changes in First-Class Mail service standards that the Postal Service implemented in 2000 and 2001, now receives two-day service instead of three-day service.
- c. Please provide the approximate volume of First-Class Mail that, as a result of the changes in First-Class Mail service standards that the Postal Service implemented in 2000 and 2001, now receives three-day service instead of two-day service.
- d. Please confirm that the changes in First-Class Mail service standards that the Postal Service implemented in 2000 and 2001 have, all else equal, lowered the value of First-Class Mail service. If you do not confirm, please explain fully and provide all documents that support your inability to confirm this statement.
- e. Except for Alaska and Hawaii, please confirm that the overnight and two-day delivery areas for First-Class Mail presently generally are limited to geographic distances that the Postal Service can reach via ground transportation. If you do not confirm, please explain.
- f. Please confirm that, prior to 2000 and 2001, the Postal Service used air transportation to achieve two-day delivery for First-Class Mail between many three-digit ZIP Code pairs (including those in states other than Alaska and Hawaii). If you do not confirm, please explain.
- g. Please confirm that the Postal Service did not provide evidence to the Commission in Docket No. R2000-1 that it was implementing changes in

First-Class Mail service standards on a largely nationwide basis. If you do not confirm, please provide copies of the documents or evidence announcing the changes.

- h. Please confirm that some of the changes in First-Class Mail service standards that the Postal Service implemented in 2000 had been implemented before the evidentiary record in Docket No. R2000-1 was closed. If you do not confirm, please explain.

DFC/USPS-T28-3. Please explain whether the value of First-Class Mail service generally is directly proportional to or inversely proportional to the speed of First-Class Mail delivery. Please provide all documents that support your response.

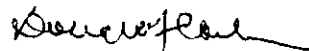
DFC/USPS-T28-4. Please provide all facts, information, and documents describing the types or functions of First-Class Mail that non-business customers send and receive.

DFC/USPS-T28-5. Please explain whether the value of First-Class Mail service generally is directly proportional to or inversely proportional to the convenience of the collection system. Please provide all documents that support your response.

DFC/USPS-T28-6. Suppose that a collection box receives an average volume on weekdays of 100 pieces of mail or more. All else equal, please confirm that a final weekday collection time on this collection box of 5:00 PM probably provides a higher value of First-Class Mail service to customers than a final weekday collection time on this collection box of 4:00 PM. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

September 28, 2001
Santa Cruz, California