

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**Complaint on First-Class Mail  
Service Standards**

**Docket No. C2001-3**

**DOUGLAS F. CARLSON  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
DECLARANT CHARLES M. GANNON  
(DFC/USPS-CMG-1-2)**

**October 12, 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,



Dated: October 12, 2001

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DOUGLAS F. CARLSON

**DFC/USPS-CMG-1.** Please refer to paragraph 18 of Declaration of Charles M. Gannon, which the Postal Service filed on July 30, 2001. Also, please refer to the response to DBP/USPS-9. Please describe the specific characteristics of First-Class Mail delivery service that will need to change or improve for you to conclude that the changes in First-Class Mail service standards that the Postal Service implemented in 2000 and 2001 will have improved the consistency of First-Class Mail service.

**DFC/USPS-CMG-2.** Please refer to paragraph 18 of Declaration of Charles M. Gannon, which the Postal Service filed on July 30, 2001. Also, please refer to the response to DBP/USPS-9. This interrogatory presents three possible sets of delivery statistics for mail originating in city A and destined to city B. Each percentage represents the percentage of the mail delivered in the number of days listed above the percentage. Suppose that the applicable delivery standard is two days. Please identify which of the three situations represents the greatest consistency of mail delivery as you used the term in paragraph 18 of your declaration. Also, please explain your reasoning.

**Situation 1**

<b>1 Day</b>	<b>2 Days</b>	<b>3 Days</b>
50%	50%	0%

**Situation 2**

<b>1 Day</b>	<b>2 Days</b>	<b>3 Days</b>
60%	30%	10%

**Situation 3**

<b>1 Day</b>	<b>2 Days</b>	<b>3 Days</b>
5%	90%	5%

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**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*.



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DOUGLAS F. CARLSON

October 12, 2001  
Santa Cruz, California