

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

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

Docket No. C2001-3

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-2-8)**

October 22, 2001

Pursuant to POR C2001-3/1 and sections 25-27 of the *Rules of Practice*, I hereby submit interrogatories to the United States Postal Service. The instructions accompanying DFC/USPS-CMG-1-2 are incorporated herein by reference.

Respectfully submitted,

Dated: October 22, 2001

DOUGLAS F. CARLSON

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

October 22, 2001
Santa Cruz, California

DFC/USPS-2. Please refer to paragraph 15 of the Declaration of Charles M. Gannon. Please provide all documents that support Mr. Gannon's assertion that "commercial air transportation service" was "more erratic and less reliable than historically had been the case, with a more significant impact on 2-Day mail." This interrogatory specifically includes documents that describe commercial air transportation service for two-day mail between cities in the western states.

DFC/USPS-3. Please refer to the response to DBP/USPS-10(b). Please provide a list of all temporary exceptions, and please identify all ZIP Code pairs that were allowed to remain three days and the reasons therefor.

DFC/USPS-4. Please refer to the response to DBP/USPS-10(c).

- a. Please provide a list of all voluntary upgrade exemptions that were requested, whether granted or not, including the reasons therefor. Please include all documents relating to these requests for voluntary upgrade exemptions.
- b. Please identify all ZIP Code pairs that were allowed to remain two days and the reasons therefor.

DFC/USPS-5. Please refer to the response to DBP/USPS-11. Please provide a list of the 124 Customer Service Facilities.

DFC/USPS-6. Please provide copies of all inquiries that the Postal Service has received from Congress in 2000 and 2001 concerning changes in First-Class Mail service standards. Please include the Postal Service's response to each congressional inquiry.

DFC/USPS-7. Please provide copies of all correspondence that the Postal Service has received from customers in 2000 and 2001 concerning changes in First-Class Mail service standards.

DFC/USPS-8. Please refer to the response to OCA/USPS-10. Please provide the EXFC on-time score for the three-digit ZIP Code pairs whose service standard was changed in 2000 or 2001 from two days to three days. For these three-digit ZIP Code pairs, please provide the EXFC on-time score for a comparable time period in the two years immediately prior to the implementation of the new service standards.