

**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  
FOLLOW-UP INTERROGATORY  
TO THE UNITED STATES POSTAL SERVICE  
(DFC/USPS-12)**

**November 30, 2001**

Pursuant to POR C2001-3/1 and sections 25–27 of the *Rules of Practice*, I hereby submit this follow-up interrogatory to the United States Postal Service. I received the initial response on November 24, 2001. The instructions accompanying DFC/USPS-CMG-1–2 are incorporated herein by reference.

*Respectfully submitted,*

Dated: November 30, 2001

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DOUGLAS F. CARLSON

**DFC/USPS-12.** Please refer to the response to DFC/USPS-GAN-17. Please also refer to the document titled "Opposition of the United States Postal Service to Douglas Carlson Motion to Compel Response to DFC/USPS-1" (filed November 14, 2001) at page 11, where the document states, "In Docket No. N89-1, destinations beyond the reasonable reach of surface transportation from a particular origin were deemed to be candidates for a 2-day service standard (based on operational and transportation feasibility and customer needs) if they received more than 0.5 percent of an originating facility's outgoing volume."

- a. Please confirm the truth and accuracy of the statement quoted in this interrogatory.
- b. During and after Docket No. N89-1, please explain the extent to which the Postal Service has used volume as a consideration in determining whether the First-Class Mail service standards between particular ZIP Code pairs would be two days or three days. In your response, please explain whether a high volume tended to increase or decrease the probability that a particular service standard would be two days instead of three days.

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### **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*.

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DOUGLAS F. CARLSON

November 30, 2001  
Santa Cruz, California