

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0000

RECEIVED

DEC 3 12 44 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

Docket No. C2001-3

**DOUGLAS F. CARLSON
NOTICE OF FILING OF REVISED PAGE
FOR INTERROGATORIES TO UNITED STATES POSTAL SERVICE
DECLARANT CHARLES M. GANNON
(DFC/USPS-GAN-32-51)**

December 3, 2001

On November 30, 2001, I filed interrogatories DFC/USPS-GAN-32-51 to Postal Service declarant Charles M. Gannon. Interrogatory DFC/USPS-GAN-50 on page 7 contained a slight error. Therefore, I am attaching a revised page 7.

Respectfully submitted,

Dated: December 3, 2001

DOUGLAS F. CARLSON

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

December 3, 2001
Santa Cruz, California

DFC/USPS-GAN-46. Please refer to the response to DFC/USPS-GAN-23. Please confirm that dedicated air transportation “has had its shortcomings.” If you do not confirm, please explain. If you confirm, please explain the types of shortcomings.

DFC/USPS-GAN-47. Please refer to the response to DBP/USPS-73(a). Might trucks destined to a particular ADC carry First-Class Mail labelled to an AADC that is different from the ADC but that is located within the service area of the ADC? If your answer is yes, is this situation common?

DFC/USPS-GAN-48. Please refer to the response to DBP/USPS-72. Please confirm that the “2 & 3-Day Model” determines service standards using projected drive times from an originating facility to a destination ADC regardless of the method of transportation actually used to transport the mail. If you do not confirm, please explain.

DFC/USPS-GAN-49. Please refer to the response to DBP/USPS-80(b). Please identify the 12 HASP facilities.

DFC/USPS-GAN-50. Please refer to the response to DBP/USPS-59. Which of the following statements do you believe better reflects the process by which most customers form their expectation of the length of time required for delivery of First-Class Mail between a particular ZIP Code pair? Please explain your answer.

Statement 1: Customers form their expectations of the length of time required for delivery of First-Class Mail based on their knowledge of the applicable service standard between a particular ZIP Code pair.

Statement 2: Customers form their expectations of the length of time required for delivery of First-Class Mail based on their prior experiences with delivery times for First-Class Mail between a particular ZIP Code pair.

DFC/USPS-GAN-51. Is it possible that First-Class Mail service standards for some ZIP Code pairs were changed from two days to three days in 2000 or 2001 even though (1) the mail continues to travel by air, before and after the changes, and (2) the air transportation was and is sufficiently reliable to meet a two-day service standard? If not, please explain.