

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSES OF CHARLES GANNON  
ON BEHALF OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DOUGLAS CARLSON  
(DFC/USPS-GAN-34 THROUGH 36)

The United States Postal Service hereby files the responses of Charles Gannon to the following interrogatories of Douglas Carlson: DFC/USPS-GAN--34 through 36, filed on November 30, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux, Jr.  
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Ratemaking

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December 12, 2001

## CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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December 12, 2001

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Michael T. Tidwell

**RESPONSES OF CHARLES M. GANNON  
ON BEHALF OF THE UNITED STATES POSTAL SERVICE  
TO DOUGLAS F. CARLSON INTERROGATORIES**

**DFC/USPS-GAN-34.**

Please refer to paragraph 18 of Declaration of Charles M. Gannon, which the Postal Service filed on July 30, 2001. Please also refer to your responses to DFC/USPS-CMG-2 and 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. 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

2 Days	3 Days	>3 Days
70%	25%	5%

Situation 2

2 Days	3 Days	>3 Days
65%	30%	5%

Situation 3

2 Days	3 Days	>3 Days
40%	55%	5%

**RESPONSE:**

The question does not denote what Service Standard is assigned to the mail in this hypothetical case. For purposes of this response, it is assumed that the standard is 2-Days. Situation 1 is the most "consistent" scenario, since the largest percentage is delivered in 2-Days. Situation 2 is the second most consistent, since the second largest percentage is delivered in 2-Days. Situation 3 is the least consistent, since the lowest percentage is delivered in 2-Days.

RESPONSES OF CHARLES M. GANNON  
ON BEHALF OF THE UNITED STATES POSTAL SERVICE  
IN RESPONSE TO INTERROGATORIES OF DOUGLAS CARLSON

**DFC/USPS-GAN-35.**

Please refer to paragraph 18 of Declaration of Charles M. Gannon, which the Postal Service filed on July 30, 2001. Please also refer to your responses to DFC/USPS-CMG-2 and 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. 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

2 Days	3 Days	>3 Days
70%	25%	5%

Situation 2

2 Days	3 Days	>3 Days
5%	85%	10%

Situation 3

2 Days	3 Days	>3 Days
40%	55%	5%

**RESPONSE:**

As with DFC/USPS-GAN-34, no Service Standard is assigned to the mail in this hypothetical case. For purposes of this response, a 2-Day standard also is assumed. Situation 1 is the most "consistent", since the largest percentage is delivered in 2-Days. Situation 2 is the least consistent, since the least amount is delivered in 2-Days. Situation 3 is the second most consistent, since the second largest percentage is delivered in 2-Days.

RESPONSES OF CHARLES M. GANNON  
ON BEHALF OF THE UNITED STATES POSTAL SERVICE  
IN RESPONSE TO INTERROGATORIES OF DOUGLAS CARLSON

**DFC/USPS-GAN-36.** Please refer to your response to DFC/USPS-CMG-2. Please identify all definitions of consistency other than the one corresponding to the way in which you used the term in paragraph 18 of your declaration that are relevant to your declaration or any of the interrogatory responses that you have provided in this proceeding.

**RESPONSE:**

In reference to First-Class Mail service performance, I have attempted to use the same definition of the term as is reflected in the response to DFC/USPS-CMG-2. Otherwise, I am not quite sure what the question seeks. If there is some particular statement that I have provided which you think needs to be clarified, let me know which one it is.