

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 INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE  
DECLARANT CHARLES M. GANNON  
(DFC/USPS-GAN-52-56)**

**December 26, 2001**

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

Respectfully submitted,

Dated: December 26, 2001

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DOUGLAS F. CARLSON

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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*.

\_\_\_\_\_  
DOUGLAS F. CARLSON

December 26, 2001  
Santa Cruz, California

**DFC/USPS-GAN-52.** Please refer to your response to DFC/USPS-GAN-34. 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 from the point of view of fulfilling the needs and preferences of postal customers as you understand postal customers' needs and preferences for consistent mail service. Also, please explain your reasoning. For this interrogatory, please assume that postal customers do not know the Postal Service's service standard for First-Class Mail originating in city A and destined to city B.

**Situation 1**

<b>2 Days</b> 70%	<b>3 Days</b> 25%	<b>&gt;3 Days</b> 5%
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**Situation 2**

<b>2 Days</b> 65%	<b>3 Days</b> 30%	<b>&gt;3 Days</b> 5%
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**Situation 3**

<b>2 Days</b> 40%	<b>3 Days</b> 55%	<b>&gt;3 Days</b> 5%
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**DFC/USPS-GAN-53.** Please refer to your response to DFC/USPS-GAN-35. 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 from the point of view of fulfilling the needs and preferences of postal customers as you understand postal customers' needs and preferences for consistent mail service. Also, please explain your reasoning. For this interrogatory, please assume that postal customers do not know the Postal Service's service standard for First-Class Mail originating in city A and destined to city B.

**Situation 1**

<b>2 Days</b> 70%	<b>3 Days</b> 25%	<b>&gt;3 Days</b> 5%
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**Situation 2**

<b>2 Days</b>	<b>3 Days</b>	<b>&gt;3 Days</b>
5%	85%	10%

**Situation 3**

<b>2 Days</b>	<b>3 Days</b>	<b>&gt;3 Days</b>
40%	55%	5%

**DFC/USPS-GAN-54.** Please refer to the Postal Service's response to DFC/USPS-GAN-39(d). In particular, please note that the question referred to the person at the highest level of "management" — not specifically "senior management" — while the response discussed "senior management."

- a. Do you believe that your position is considered a position in management?
- b. Do you believe that your position is considered a position in senior management?
- c. Did you make or approve the decision not to use dedicated air transportation to maintain two-day delivery of First-Class Mail in lieu of changing some service standards to three days? In your response, if applicable, please identify all individuals in the Postal Service at a higher level of management than you who made or approved this decision.

**DFC/USPS-GAN-55.** Please refer to your response to DFC/USPS-GAN-40.

- a. Does the specific SCF that processes the mail destined to a "pseudo" ADC in California change from time to time?
- b. At some time in the past two years, did the San Francisco P&DC process the incoming mail for ADC Sierra CA and ADC Peninsula CA? (Note that interrogatory DFC/USPS-GAN-40(b) asked a variation of this question, but the response did not address it.)
- c. Are the SCF's that the Pacific Area designated for purposes of projecting drive times in PC Miler the same SCF's that currently process incoming mail for the four "pseudo" ADC's in California?

**DFC/USPS-GAN-56.** Please refer to the response to DFC/USPS-GAN-50. Please provide the number of postal customers who receive the Service Standards CD-ROM.