

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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FEDERAL BUREAU OF INVESTIGATION
DEPARTMENT OF JUSTICE

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-57-59)

January 21, 2002

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

Respectfully submitted,

Dated: January 21, 2002

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

January 21, 2002
Santa Cruz, California

DFC/USPS-GAN-57. Please refer to the responses to DFC/USPS-GAN-14, 39, and 54.

- a. Notwithstanding the reasons that you have explained already for not presenting senior management with the option of using dedicated air transportation to maintain some two-day service standards instead of changing these service standards to three days, do you agree that your team could, feasibly or conceivably, have presented senior management with the option of using dedicated air transportation to maintain some two-day service standards instead of changing these service standards to three days? If your answer is not an unqualified yes, please explain.
- b. Please identify the person at the highest level of management who is responsible for the result that senior management was not presented with the option of using dedicated air transportation to maintain some two-day service standards instead of changing these service standards to three days. In your response, please include the person's title. If more than one person is responsible for this result, please provide the name and title of each person.

DFC/USPS-GAN-58. Please refer to your response to DFC/USPS-55.

- a. Please confirm that the San Francisco P&DC was responsible for processing incoming First-Class Mail labelled to ADC Sierra CA and ADC Peninsula CA during the entire calendar years 1999, 2000, and 2001. If you do not confirm, please explain.
- b. Please confirm that the Los Angeles P&DC was responsible for processing incoming First-Class Mail labelled to ADC Twin Valley CA and ADC Sequoia CA during the entire calendar years 1999, 2000, and 2001. If you do not confirm, please explain.
- c. Please confirm that the Los Angeles P&DC is responsible for processing incoming First-Class Mail labelled to ADC Los Angeles CA.
- d. Please confirm that First-Class Mail originating in Reno and labelled to ADC Los Angeles CA arrives in the P&DC building that houses the destination SCF sooner than First-Class Mail originating in Reno and labelled to ADC Twin

Valley CA arrives in the P&DC building that houses the destination SCF. If you do not confirm, please explain.

- e. Please explain the route and method used to transport First-Class Mail from the Reno P&DC to ADC Los Angeles CA, ADC Twin Valley CA, and ADC Sequoia CA. In your response, please explain whether mail destined to two or more of these ADC's likely travels on the same truck or airplane.
- f. Please explain the route and method used to transport First-Class Mail from the San Diego P&DC to ADC Sierra CA and ADC Peninsula CA. In your response, please explain whether mail destined to both ADC's likely travels on the same truck or airplane.
- g. Please discuss the extent to which the San Diego P&DC likely labels First-Class Mail destined to SCF's in ADC Sierra CA and ADC Peninsula CA to the SCF level, not the ADC level. For example, would mail destined to SCF Sacramento CA be labelled to SCF Sacramento CA, not ADC Sierra CA? Similarly, would mail destined to SCF North Bay CA be labelled to SCF North Bay CA, not ADC Peninsula CA?
- h. Please confirm that SCF Oakland CA is located in ADC Sierra CA, ADC Sierra CA mail is targeted for San Jose in the service-standards model, and ADC Peninsula CA mail is targeted for Oakland in the service-standards model. If you do not confirm, please explain.

DFC/USPS-GAN-59. Please refer to USPS-LR-C2001-3/1, file OCA-12B-2. Please identify all instances nationwide where the column labelled "5-Digit ADC Location" does not provide the five-digit ZIP Code of the facility that actually processes incoming mail labelled to that ADC.