

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

**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-63-66)**

November 4, 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: November 4, 2002

DOUGLAS F. CARLSON

DFC/USPS-GAN-63. Please refer to your response to DFC/USPS-GAN-61(b). Please explain what the letters “THS” stand for.

DFC/USPS-GAN-64. Please refer to your response to DFC/USPS-62. Please explain how First-Class Mail is transported to the San Diego P&DC from the following origin P&DC's:

- (i) Oakland P&DC
- (ii) San Francisco P&DC
- (iii) San Jose P&DC
- (iv) North Bay P&DC
- (v) Salinas P&DF

In your response, please specify which of the originating facilities have direct (separate) trucks to the San Diego P&DC, and please specify the arrival time of each truck at the San Diego P&DC.

DFC/USPS-GAN-65. Please refer to your response to DFC/USPS-GAN-62. Please provide the arrival times of the trucks that transport First-Class Mail from the San Diego P&DC to the Oakland P&DC, the San Francisco P&DC, and the San Jose P&DC.

DFC/USPS-GAN-66. Please refer to your response to DFC/USPS-GAN-62(b), which indicates that First-Class Mail from the San Diego P&DC to the North Bay P&DC is transported directly to the North Bay P&DC, bypassing the ADC that serves the North Bay P&DC. Please explain how you would determine whether the arrival of mail from the San Diego P&DC to the North Bay P&DC at 17:45 is consistent with the national model, which provides for a CET at the *destination ADC* not later than 18:00.