

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

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

Docket No. C2001-3

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DOUGLAS CARLSON
(DFC/USPS-15)**

The United States Postal Service hereby provides its response to DFC/USPS-15, an interrogatory from Douglas Carlson filed on April 16, 2003. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

CERTIFICATE OF SERVICE

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

Michael T. Tidwell

May 2, 2003

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-15. Please refer to the response to DFC/USPS-13. Interrogatory DFC/USPS-13 was not restricted to mail for which the service standard still is two days. Therefore, for mail originating in or destined to the California cities of San Francisco, Oakland, and San Jose, please identify all instances of changes in First-Class Mail service standards from two days to three days that were implemented in 2000 or 2001 in which the affected mail was transported by air before the changes in service standards were implemented and in which the affected mail continues to be transported by air subsequent to implementation of the changes in service standards.

RESPONSE

DFC/USPS-13 specifically referred to DBP/USPS-85(o), which pertained to a particular 2-day service standard scenario. Accordingly, DFC/USPS-13 was interpreted as referring to 2-day mail. In any event, as indicated in the second portion of the response to DFC/USPS-13, the Postal Service does not have a systematic way of distinguishing whether mail being flown between air stops is 2-day or 3-day mail, or for identifying the specific postal facility of entry for volume emanating from a particular air stop. See *also*, the supplemental response to DBP/USPS-17b.

In other words, the Postal Service has never had a systematic method for providing the requested information -- either for today's operations, or for historical review/comparison purposes.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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RESPONSE to DFC/USPS-15 continued

It would be possible for the Postal Service on a random day to examine random mail pieces in random air containers at selected air stops to determine the apparent origins/destinations of those pieces and the applicable service standards. Putting aside the issue of whether such contemporary data could be deemed representative of mailflows at that air stop, there still are no similar data from before the service standard changes at issue in this proceeding were made, and therefore, no basis for even the most superficial before-and-after comparison.