

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

Postal Rate and Fee Changes, 2005

Docket No. R2005-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JEFFERY W. LEWIS
(DFC/USPS-T30-1-5)**

June 1, 2005

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Jeffery W. Lewis.

The instructions contained in my interrogatories DFC/USPS-1–19 are incorporated herein by reference.

Respectfully submitted,

Dated: June 1, 2005

DOUGLAS F. CARLSON

DFC/USPS-T30-1. Please refer to your testimony at pages 218 and 219. Please discuss the extent to which letter carriers who deliver mail to customers also collect mail from collection boxes.

DFC/USPS-T30-2. Please discuss the extent to which the Postal Service uses dedicated collection routes, rather than letter carriers who are also delivering mail to customers, to collect mail from collection boxes.

DFC/USPS-T30-3. To the extent that information is available in the Collection Point Management System database or another database, please identify the percentage of collection boxes for which at least one collection per day is performed by a letter carrier whose duties on that day also include delivery of mail to customers. Please provide a breakdown for residential boxes and business collection boxes (as those boxes are coded in the database).

DFC/USPS-T30-4. Please refer to your testimony at page 22, lines 6–14.

- a. In which way is the mail that arrives at the VIM room “unworked”?
- b. Please explain why mail delivered to a VIM room would not be sorted or sequenced by business name, suite number, or apartment number.

DFC/USPS-T30-5. With specific reference to DPS and the arrival times of mail at post offices from P&DC’s or other processing facilities, please explain how the Postal Service makes First-Class caller-service mail available earlier than mail destined to actual post-office boxes.