

**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 THOMAS E. THRESS
(DFC/USPS-T7-1-5)**

June 9, 2005

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Thomas E. Thress.

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

Respectfully submitted,

Dated: June 9, 2005

DOUGLAS F. CARLSON

DFC/USPS-T7-1. Please refer to your testimony at page 293.

- a. Please identify the source of the data for Priority Mail average days to deliver that you used in your calculations.
- b. Suppose a customer sends a Priority Mail item on a Saturday to a destination for which the service standard is two days. Suppose, further, that this Priority Mail item is delivered on Monday (and that Monday is not a holiday). For purposes of your how you used this data in your calculations, please provide the number of days to deliver this item.
- c. In the example in part (b), if you asked customers how many days were required to deliver this item, which number of days do you believe that they would say?

DFC/USPS-T7-2. In your testimony concerning Express Mail service, including your demand and volume projections, did your calculations and analyses consider Express Mail as an overnight service only, or did your calculations and analyses recognize that Express Mail sometimes is guaranteed for delivery in two to four calendar days? Please explain.

DFC/USPS-T7-3. In your testimony concerning Express Mail service, including your demand volume projections, did you compare Express Mail service to FedEx's overnight services only?

DFC/USPS-T7-4. At the time that you wrote your testimony, were you aware that the Postal Service sometimes guarantees Express Mail for delivery two, three, or four calendar days after the date of mailing? If so, please explain when and how you learned of this aspect of Express Mail service.

DFC/USPS-T7-5. Do you believe that speed of delivery is relevant to the demand for Express Mail service? Please explain your answer.