

DOCKET SECTION

BEFORE THE

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE
UNITED STATES POSTAL SERVICE
(DFC/USPS-19-23)**

November 24, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice* and section 2(E) of the *Special Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to the United States Postal Service. Responses to these interrogatories will assist me in preparing my direct case.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,



Dated: November 24, 1997

DOUGLAS F. CARLSON

DFC/USPS-19. This interrogatory refers to the response to DFC/USPS-9 and the system revealed in that response that will “monitor whether respective facilities meet their box cut off times.”

- a. When did the Postal Service begin planning this system?
- b. Please provide all documents and other information relating to the reasons why this system was developed.
- c. Please describe the meaning of “in the process of rolling out.” Please provide a timetable for implementation to the extent that one is known.
- d. Is this system in operation yet in any post offices? If so, please provide a list of post offices in which this system exists, the date on which the system was implemented in each post office, an analysis of the success of the system in each post office, and a report on the operational changes (including changes in the posted cutoff time) that this system has prompted in these post offices.
- e. Will this system require all post offices to post a cutoff time for box mail?
- f. If the answer to part (e) is not an unqualified yes, will a post office be able to opt out of or otherwise avoid this new system by removing its signs that indicate cutoff times for box mail? Please explain.
- g. Please explain the difference, if any, between the “scheduled” time for box mail to be finalized and available to customers and the “posted” time.
- h. Will a unit be considered to be on time only if the box mail is *distributed to the boxes* not later than the scheduled and posted cutoff time?
- i. Please provide the best quantitative definition that is available of “consistently” as the term is used in the following sentence in the interrogatory response: “If a unit consistently fails to meet the box cut off time, analysis should be done to review possible actions to help the unit meet the cut off time.”
- j. Would the system’s operation be accurately described if the word “should” in the quoted sentence in part (i) were replaced with the word “must”? If not, please explain why operations at an office that consistently failed to meet the cutoff time might nevertheless not be analyzed to review possible corrective actions.

k. Please explain how the Postal Service will determine the needs of customers if corrective action is not effective and the Postal Service considers moving the cutoff time.

l. Suppose a unit consistently fails to meet the posted cutoff time. Suppose, further, that this post office is located in an urban area, five miles from the P&DC, and receives all its First-Class Mail by 7:00 AM. Would the Postal Service consider movement of the existing 11:00 AM cutoff time to a later time to be a reasonable step to improve consistency in meeting the cutoff time? Please explain.

m. Is an 11:00 AM cutoff time for the unit described in part (l) reasonable?

n. Under this system, how often will a unit's performance be monitored?

o. Will the staff of the unit be aware of the monitoring while it is taking place?

p. Will the manager of the facility be aware of the monitoring more than one day before the monitoring begins? If so, for how many days prior to the beginning of the monitoring will the manager be aware of the monitoring?

q. Will the personnel who conduct the monitoring work for the post office that is being monitored? If not, please identify the office for which these employees will work.

r. Will this system monitor every postal facility?

DFC/USPS-20. Please provide all documents, directives, and guidelines that Area offices have issued since the inception of EXFC that dictate, govern, or otherwise influence the determination of the collection times that are posted on collection boxes. This interrogatory seeks only information that relates to steps that Area offices have taken partially or entirely for the purpose of reducing the likelihood that a collection box will be collected prior to the posted collection time. For all information that is provided, please specify whether the information applies to all post offices within the Area or only to post offices that are located in cities that are monitored under EXFC.

DFC/USPS-21. Please provide all documents, directives, and guidelines that Area offices have issued since the inception of EXFC that dictate, govern, or otherwise influence the response of a post office when a monitoring system reveals, on a given day, that the final collection of a collection box has not been made by the end of the responsible carrier or collector's route. Please specify whether the post office's response to the knowledge that a box was not collected will depend on whether the box is located in a city that is monitored by EXFC.

DFC/USPS-22. Suppose that: a post office uses the Collection Management System; each collection box has a button inside that the collector scans with a hand-held wand when he collects the box; and, on a particular day, when the collector returns to the post office and the data from the wand are uploaded to a computer, the computer reports that the day's final collection for a collection box was not made. Will the post office be more likely to send a collector to this box to make a collection if the post office is located in a city that is monitored by EXFC than if the post office is located in a city that is not monitored by EXFC?

DFC/USPS-23. Please provide the posted and scheduled Saturday collection times for the collection boxes that are located outside the post office in Emeryville, California.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

November 24, 1997
Emeryville, California