

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

**Evolutionary Network Development
Service Changes**

Docket No. N2006-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE
UNITED STATES POSTAL SERVICE
(DFC/USPS-1-5)**

April 6, 2006

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

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

“All documents” means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness’ responses and should “show what the numbers were [and] what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please

provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,

Dated: April 6, 2006

DOUGLAS F. CARLSON

DFC/USPS-1. Please refer to footnote 1 on page 23 of the Postal Service's response to the Commission's Notice of Inquiry No. 1. For each of the 161 collection boxes in the 985 ZIP Code area for which the collection time was changed from 5:00 PM to 4:00 PM, please provide the average weekday volume of mail that each box received. In your response, please include the location ID number of the box, the box address, and the date of the study that collected the volume data.

DFC/USPS-2. Please refer to footnote 1 on page 23 of the Postal Service's response to the Commission's Notice of Inquiry No. 1. Please confirm that the numbers of boxes cited in the footnote refer to the entire 985 ZIP Code area, not solely the service area of the Olympia post office.

DFC/USPS-3. Please refer to footnote 1 on page 23 of the Postal Service's response to the Commission's Notice of Inquiry No. 1. As of a date prior to, and reasonably close to, the date on which collection times were changed from 5:00 PM to 4:00 PM, please provide the following information, in electronic format, for every collection box in the 985 ZIP Code area: location ID number, box address, description of address, city, state, service class, box type, area of box, final weekday collection time, and final Saturday collection time.

DFC/USPS-4. Please refer to footnote 1 on page 23 of the Postal Service's response to the Commission's Notice of Inquiry No. 1. Please provide all documents relating to the Postal Service's consideration, evaluation, or assessment of the extent to which a change in collection times from 5:00 PM to 4:00 PM would or would not meet the needs or requirements of the community or conform to the Postal Service's national service standards for collections.

DFC/USPS-5. Please refer to footnote 1 on page 23 of the Postal Service's response to the Commission's Notice of Inquiry No. 1. Please provide the Postal Service's national service standards for collections and any memos relating to the requirements contained therein that Postal Service headquarters has issued since 2002.