

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

**Postal Rate and Fee Changes, 2006**

**Docket No. R2006-1**

**DOUGLAS F. CARLSON  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN W. BERKELEY (DFC/USPS-T34-1-4)**

**May 23, 2006**

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

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: May 23, 2006

DOUGLAS F. CARLSON

**DFC/USPS-T34-1.** Please provide a citation to the DMM or DMCS to support your statement on page 3, lines 4–6 that Express Mail provides “guaranteed” delivery.

**DFC/USPS-T34-2.** Please refer to your testimony on page 4, lines 7–9. Please confirm that several days may pass after a customer mails an Express Mail item before the customer receives a receipt showing the time and date of mailing and specifying the date and time of the delivery commitment. If you do not confirm, please explain.

**DFC/USPS-T34-3.** For Express Mail deposited in Express Mail collection boxes, please confirm that the acceptance time indicated in the Postal Service’s electronic Track & Confirm system may differ, by more than a few minutes, from the acceptance time written on the Express Mail receipt. If you do not confirm, please explain.

**DFC/USPS-T34-4.** Please refer to your testimony on page 8, lines 7–9.

- a. Please provide a citation from the DMM or DMCS to support your statement that Next Day Post Office to Addressee service provides “guaranteed next day delivery[.]”
- b. Do you agree that the only guarantee is for a refund of postage if delivery is not achieved by the promised date and time? If not, please explain.