

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
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EVOLUTIONARY NETWORK DEVELOPMENT]  
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-74-78]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory; however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

April 24, 2006  
N200610

Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-74                      Please refer to the response to Interrogatory OCA/USPS-T1-2 as revised on April 10, 2006. If a processing facility were to process a First-Class Mail parcel, a Priority Mail parcel, and a Standard Mail parcel together, how would that affect the different service standards that apply to these three different services?

DBP/USPS-75                      Please refer to the response to Interrogatory OCA/USPS-20 subpart [b] [iv] [1]. [a] Please confirm, or explain if you are unable to confirm, that for the ten facilities shown there were no changes in any of final collection times shown on a blue collection box at any of the offices served by that facility other than the 38 boxes at

Greensburg, 1 box at Waterbury, 10 boxes at Marysville, the 274 boxes at Pasadena that were changed and then changed back to the original times, and the 192 boxes at Olympia starting at the time that the study was implemented and running until the time that the response was prepared to the interrogatory. [b] Please provide the total number of boxes at the Kinston and Monmouth facilities. [c] Please provide the details of the changes that were made at the Greensburg, Waterbury, Marysville, Pasadena, and Olympia facilities including the before and after times of the boxes and the before and after times of the final dispatch of the mail from the associated post office that collected from each of the boxes. [d] Please discuss why the final collection times of the 274 Pasadena boxes were returned to the original collection time.

DBP/USPS-76 Please refer to the revised response to Interrogatory DBP/USPS-33 subpart b. Item 19 refers to Monday thru Friday. Please advise what happens to mail deposited on Saturdays.

DBP/USPS-77 Please refer to your response to DBP/USPS-65. The last sentence of the Docket No. C2001-3 Gannon Declaration at ¶ 33 [July 30, 2001] ends with the clause, "that are 3-Days were beyond the 12 hour drive-time, which was applied nationwide." [a] Please advise the extent to which the 12-hour drive-time has been utilized nationwide for determining the line between 2-day and 3-day delivery. [b] Please provide a complete listing of those ZIP Code pairs that are either 3-day delivery with a drive-time of less than 12 hours or are 2-day delivery with a drive-time of greater than 12 hours. [c] Please discuss the rationale for each of the exceptions to the 12-hour drive-time standard.

DBP/USPS-78 Please refer to your response to DBP/USPS-65. Please confirm, or explain if you are unable to do so, that when Witness Potter stated in Docket N89-1, USPS-T-2, Appendix A, section 4.2 that, "Two-day delivery standards **must** [emphasis provided] also include all SCFs within the home state and nearby states that are within the reasonable reach of surface transportation.", the definition of reasonable reach is now the 12-hour rule and therefore the 12-hour rule is the primary rule for determining 2-days vs. 3-days.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin April 24, 2006

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