

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-1 through 20]

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."

May 4, 2006

Respectfully submitted,

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

DBP/USPS-1 Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail, please list the maximum and/or minimum size, weight, shape, or other characteristics that will determine whether the article is mailable or not.

DBP/USPS-2 Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail, please list the maximum and/or minimum size, weight, shape, or other characteristics that will determine whether the article is mailable or not.

DBP/USPS-3 Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail, that weighs one ounce or less, [a] please confirm, or explain if you

are unable to confirm, that the postage for that article will be either be 39¢ or 52¢. [b] Please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece. [c] Please list all of the characteristics which will result in the imposition of the 13¢ nonmachinable surcharge.

DBP/USPS-4 Under the present rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs over one ounce and less than 13 ounces, please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

DBP/USPS-5 [a] Please provide the characteristics and requirements of a mailpiece defined as a "letter", "flat", and "parcel" as they refer to First-Class Mail. [b] Please describe any changes that are being made in this Docket. [c] Please indicate the other classes of mail that utilize a definition for a "letter", "flat", and/or "parcel" and describe any differences.

DBP/USPS-6 Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs one ounce or less, [a] please confirm, or explain if you are unable to confirm, that the postage for that article will be either be 42¢, 62¢, or \$1.00. [b] Please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

DBP/USPS-7 Under the proposed rates and classifications if a mailer has a mailpiece to send via First-Class Mail that weighs over one ounce and less than 13 ounces, please discuss the characteristics of the mailpiece that must be evaluated by the mailer to determine the proper postage for this mailpiece.

DBP/USPS-8 Please confirm, or explain if you are unable to confirm, that the proposed postage for a First-Class Mail article weighing under 13 ounces will have a base rate of either 42¢, 62¢, or \$1.00 based on its size/shape characteristics which covers the first ounce and then 20¢ for each additional ounce above the first ounce regardless of its size/shape or characteristics.

DBP/USPS-9 Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the weight of the mailpiece will not change and can be measured by a scale.

DBP/USPS-10 Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the length and height of the mailpiece will normally not change and can be easily measured by a ruler.

DBP/USPS-11 [a] Please confirm, or explain if you are unable to confirm, that when a mailer has a First-Class Mail article to mail and the article has been prepared, the thickness of the mailpiece may be subject to change depending on the compression that is applied to the mailpiece. [b] Please advise what level of compression will be applied by the Postal Service in evaluating the thickness of the mailpiece. [c] Please confirm, or explain if you are unable to confirm, that if the thickness of the mailpiece exceeds the allowable limit at any point in the surface of the mailpiece, the entire mailpiece will be assumed to have that higher value.

DBP/USPS-12 [a] Please confirm, or explain if you are unable to confirm, that at the present time a one-ounce or less First-Class Mail article that exceeds the 1/4 inch thickness will be subject to a 13¢ surcharge. [b] Please describe the method that processing plants utilize to determine whether a mailpiece exceeds a thickness of 1/4 inch [please provide a photograph of the equipment].

DBP/USPS-13 Please describe in detail, including pictures, the method that a retail window clerk will utilize to determine whether the thickness of a mailpiece exceeds 1/4 inch.

DBP/USPS-14 [a] Please describe in detail the methods that a retail window clerk will utilize under the proposed rules to determine whether a First-Class Mail article weighing less than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece. [b] Same as subpart a except provide a response for the methods for a processing facility.

DBP/USPS-15 Please describe in detail the methods that a mailer will be expected to utilize under the proposed rules to determine whether a First-Class Mail article weighing less

than 13 ounces is a letter, flat, or parcel with particular emphasis on determining the thickness of the mailpiece.

DBP/USPS-16 Please discuss the methods by which First-Class Mail letters, flats, and parcels will be processed and handled and the instances where articles which are properly paid at one category will be processed in another category such as a mailpiece which requires postage at the flat rate will still be processed as a letter.

DBP/USPS-17 [a] Please discuss in detail the action that is taken by the Postal Service when shortpaid mail is discovered. Please include discussion of the action taken for different classes of mail, whether it is shortpaid or has no postage affixed, the quantity involved, whether the mailpiece has a return address, etc. [b] Please provide any specific procedure involved in handling a one ounce mailpiece that requires the 13¢ surcharge and has only a 39¢ stamp affixed. [c] Please describe any changes in dealing with shortpaid mail that will be made as a result of the proposed rates and classification. [d] How will shortpaid mail be handled that results from a misclassification of a mailpiece between a letter, flat, or parcel?

DBP/USPS-18 On May 9, 2005, the Postal Service filed USPS-LR-K-127 which contained the Statement of Work for Transit-Time Measurement System [TTMS} dated October 26, 2001. [a] Is this the latest version of this publication? [b] If not, provide the changes or latest version. [c] That Library Reference contained fourteen appendices which were not provided in the original Library Reference. Please either provide copies of these appendices or file them as a Library Reference.

DBP/USPS-19 In the Opinion and Recommended Decision for Docket R2005-1, the Commission stated in footnote 72 with respect to the \$1 charge that is being made for Change of Address requests that are made on the Internet that, "The Commission expects this issue to be raised again in the next omnibus rate case." [a] Please advise the Rate Schedule and DMCS Section that contain this \$1 fee. [b] If it was not included, please provide the reasons for not doing so.

DBP/USPS-20 Please provide a complete listing of the methods by which a customer may file for a change of address and the fee, if any, associated with each method.

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 May 4, 2006
