

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-519-545]

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."

August 14, 2006

Respectfully submitted,

R20061XX519

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

DBP/USPS-519 Please refer to your response to Interrogatory DBP/USPS-409. The response to Interrogatory DBP/USPS-48 subpart b filed on July 20, 2006, stated that there were no corrections necessary to the EXFC mailpiece chart. Comparison with the chart filed with the response to Interrogatory DBP/USPS-409 showed a number of apparent updates from the original chart particularly in the dimensions of the mailpieces and elimination of the Code G mailpiece.

[a] Please advise whether the Chart filed on July 20, 2006 in response to Interrogatory DBP/USPS-48 or the Chart filed on August 7, 2006 in response to Interrogatory DBP/USPS-409 contains the correct information.

[b] Please advise why the July 20, 2006, response stated "None were necessary" when apparently a number of corrections or updates were necessary.

DBP/USPS-520 Please refer to your response to Interrogatory DBP/USPS-409.

[a] Please explain why the EXFC performance for cards and flats is significantly lower than that for letter-size mailpieces in all three categories [Overnight and 2- and 3-day]

[b] Please advise the steps that are being taken to improve this performance.

DBP/USPS-521 Please refer to your response to Interrogatory DBP/USPS-379 subpart b.

[a] Please explain why you believe that post office boxholders should be concerned that the construction of their post office box might not provide sufficient security for their mail.

[b] Please advise the steps that are being taken to improve the security provided to post office box construction.

DBP/USPS-522 Please refer to your response to Interrogatory DBP/USPS-380. The following Interrogatory relates to Express Mail that is entered in the system at a post office that is on the Guam side of the International Dateline and is destined to addressees that are on the 48-states side of the International Dateline. The effects of Sundays or holidays should not be considered. For purposes of this Interrogatory, please define the term "calendar date" as the date that will appear on a calendar at the particular location being considered and the term "physical day[s]" as the number of physical days that pass from the day the mailpiece is entered in the system to the day that the mailpiece is delivered [For example, if an Express Mail article is mailed on a calendar day of Monday in Guam, the calendar day in Honolulu at that time of mailing will be Sunday and the overnight physical day to delivery would have the article delivered in Honolulu on a calendar day of Monday after the passage of one physical day].

[a] For Express Mail that crosses the International Dateline, does the term "Next" or "2nd" under Day of Delivery refer to calendar days or physical days?

[b] Does the "Scheduled Date of Delivery" show the calendar date at the delivery location or does it take the effects of the International Dateline?

[c] For Express Mail deposited in Guam and other locations on that side of the International Dateline and destined for delivery across the International Dateline, are there any locations that will be guaranteed delivery on the next physical date?

[d] If so, provide a general indication of the places that will receive this level of service.

[e] Will all other areas on the 48-states side of the International Dateline receive a guaranteed delivery on the second physical day or will some areas receive a guaranteed delivery on the third physical day?

[f] If some areas receive a guaranteed delivery on the third physical day after mailing, please provide a general indication of the places that will receive this level of service.

[g] Please confirm, or explain if you are unable to confirm, that delivery on the third physical date, even though it is still only two calendar days later does not meet the service standards of overnight or 2-day delivery [assume no effect of Sunday or holiday delivery].

DBP/USPS-523 Please refer to your response to Interrogatory DBP/USPS-382 subpart b [incorrectly shown as subpart c on the response].

If one adds the implied statement to the Interrogatory of "and receive the guaranteed delivery standards that are established for mail deposited that day" at the end of the Interrogatory it would indicate the intent of the original Interrogatory for which a response is desired.

In other words, is an office is permitted to establish a cut-off time prior to the opening of the retail service window hours - such as a cut-off time at 7 AM and the window doesn't open until 8 AM and therefore making it impossible for a mailer to enter an Express mailpiece over the retail window in a manner that will achieve the delivery standards for mail deposited that date,

DBP/USPS-524 Please refer to your response to Interrogatory DBP/USPS-167. This follow-up Interrogatory is being filed today [since it must be filed within 7 days] without prejudice to my Motion to Compel a full response to the original Interrogatory.

Your response indicates that I should refer to the response to Interrogatory DBP/USPS-127 filed in Docket R2005-1 as follows:

DBP/USPS-127. Please refer to your response to DBP/USPS-88.

(a) Please confirm, or explain if you are unable to confirm, that the data provided in response to Interrogatory DBP/USPS-65 subpart d in Docket R2001-1 is still

correct for the 20 referenced offices.

(b) Please provide an estimate as to the number of additional post offices that would be added to the listing if a complete study was made.

(c) Since most of the offices appear to be in Alaska, has the District Manager of the Alaska District been queried as to the offices in his District that do not have 6-day a week mail service? If not, why not? If so, what was the response?

RESPONSE:

(a) The data is still correct for 15 of the 20 offices cited. The offices of Chitina, Chignik, Chignik Lagoon, Eagle, and King Cove are currently receiving shipments of Express Mail six days per week.

(b) As noted in the response to DBP/USPS-88, a complete study would produce list that is substantially similar in both size and scope to the one provided in response to DBP/USPS-65(d) in Docket No. R2001-1. A quantitative estimate by which the number of offices on that list would increase (or decrease) cannot be provided because no complete study has been undertaken.

(c) The District Manager has been queried and responds that the service being provided is a longstanding traditional service to very unique and remote areas that are experiencing no growth whatsoever, that an appropriate level of service is being provided, and that there are no initiatives under consideration to change the present level of service.

[a] Please refer to the response to subpart c of Docket R2005-1 Interrogatory and provide a response from the District Manager of the Alaska District showing which offices in his District that do not have 6-day a week mail service. The response that was originally made did not respond to the request that was made but attempted to explain and justify why there are offices that do not have 6-day a week mail service.

[b] The response to Interrogatory DBP/USPS-380 appears to indicate that there are some instances where there are excessive distances [or lack of transportation] to meet the guaranteed delivery standards. Please explain.

DBP/USPS-525 Please refer to your response to Interrogatory DBP/USPS-399 subpart d. Please advise the wording of the rule and DMCS wording that will be adopted to indicate this change and when the filing will be amended to accomplish this change.

DBP/USPS-526 Please refer to your response to Interrogatory DBP/USPS-400 subpart e. Please explain why you were not able to confirm the DW weight of 82 pounds for the sample parcel that was referenced. My calculation would be as follows:

71 [the diameter] times 71 [the diameter] times 4 [the rounded value of 12 divided by pi] times 0.785 divided by 194.

DBP/USPS-527 Please refer to your response to Interrogatory DBP/USPS-401. Please confirm, or explain if you are unable to confirm, that for all shapes and sizes of parcels the determination of whether the parcel exceeds one cubic foot [so as to be subject to the DW calculation] will be accomplished by multiplying three dimensions [in inches] and then dividing by 1728 and that the DW will be calculated by multiplying the same three dimensions then multiplying by 0.785 if the parcel is not a rectangular solid and then dividing by 194.

DBP/USPS-528 Please refer to your response to Interrogatory DBP/USPS-289 subpart a.

My original Interrogatory contemplated the following scenario:

1. An article was deposited in a collection box on Monday at 4 PM
2. The final collection time on the box was scheduled at 5 PM
3. The Monday collection was missed
4. The mail was collected at 5 PM on Tuesday
5. The mail was entered into the PTS on Tuesday
6. The mail from NJ to DC which is normally a 2-day standard arrived and was delivered in DC on Thursday.

The PTS would show a delivery time of two days when in fact it was actually three days.

Please respond to the original Interrogatory.

DBP/USPS-529 Please refer to your response to Interrogatory DBP/USPS-289 subpart e. The original Interrogatory utilized the words "may cause some mailers". Please explain why you are unable to confirm that this condition MAY cause SOME mailers to utilize Express Mail.

DBP/USPS-530 Please refer to your response to Interrogatory DBP/USPS-289 subpart g. Most of the Delivery Confirmation articles that I receive have an "Arrival at Unit" scan which is made at the Post Office Annex before the mail is sent up to the Main Post Office where I have my post office box. My perception is that Delivery Confirmation mail is all scanned with an Arrival at Unit scan and will have to be "held out" in an area and then each of the articles will be scanned and then forwarded on for delivery. Please respond to this scenario.

DBP/USPS-531 Please refer to your response to Interrogatory DBP/USPS-289 subparts h and i.

Which specific answers in the referenced OCA responses refer to my questions?

DBP/USPS-532 Please refer to your response to Interrogatory DBP/USPS-289 subparts d and e.

Your responses to these two subparts appear to be conflicting. Please explain why your response to subpart d states that I may direct my PO-PO Express Mail to either of the two facilities that utilize the same 5-digit ZIP Code and your response to subpart e states that I am restricted to only certain facilities that may use the same 5-digit ZIP Code.

DBP/USPS-533 Please refer to your response to Interrogatory DBP/USPS-289 subparts b and c. Your response did not respond to the very specific questions that were posed in the original Interrogatory subparts.

DBP/USPS-534 Please refer to your response to Interrogatory DBP/USPS-403. Your response provided a listing of some 469 3-digit ZIP Code prefixes that are not part of the EXFC program. This is slightly more than one-half of all of the 3-digit ZIP Code prefixes [since there are 463 3-digit ZIP Code prefixes that are part of the EXFC program.

[a] Please confirm that with this breakdown of areas the mail volume does meet the geographic and volume density from which 90% of First-Class volume originates and 80% destines.

[b] Please provide the raw data that will confirm that the 90% and 80% values referenced above are complied with.

[c] Please indicate why the 463 prefixes have been chosen to be part of the program and/or why the 469 prefixes were not chosen to be part of the program.

DBP/USPS-535 Please refer to your response to Interrogatory DBP/USPS-317.

[a] Please confirm, or explain if you are unable to confirm, that the mystery shopper reports indicate the time that the shopper had to wait for retail window service.

[b] Please indicate why it would not be possible to evaluate a significant number of these reports in the period before the last rate increase, after the last rate increase, and a representative time period not associated with the rate increase to obtain a response to the original interrogatory.

DBP/USPS-536 Please refer to your response to Interrogatory DBP/USPS-374. Please confirm, or explain if you are unable to confirm, the only claim [beyond the refund of postage] that may be paid for the delay of Express Mail beyond its guaranteed delivery time is for document reconstruction and that the term documents is defined [as are the conditions for a document reconstruction claim] at the end of DMM Section 609.4.2.a.

DBP/USPS-537 Please refer to your response to Interrogatory DBP/USPS-376 subpart a. Please confirm, or explain if you are unable to confirm, that the guide that was attached to the Interrogatory response and Notice 3A referenced in response to Interrogatory DBP/USPS-11 do not provide any additional guidelines to postal acceptance clerks but only serve to take the appropriate DMM wording that already exists and place it in a convenient format.

DBP/USPS-538 Please refer to your response to Interrogatory DBP/USPS-376 subpart b. [a] Please confirm, or explain if you are unable to confirm, that the uneven application of requirements is not a desirable condition. [b] Please advise the steps that the Postal Service takes or is planning to take to correct this condition.

DBP/USPS-539 Please refer to your response to Interrogatory DBP/USPS-377 subpart a. [a] Please confirm, or explain if you are unable to confirm, that if a mailer places an index card that measures 3 inches by 5 inches into a standard number 10 envelope that the thickness of the mailpiece will be uneven because the thickness of the mailpiece will be different in the place where the card is as opposed where the card is not and yet the mailpiece will not be charged the nonmachinable surcharge. [b] Please confirm, or explain if you are unable to confirm, that the nonmachinable surcharge will only apply if the uneven thickness is caused in a significant manner such as would be caused by placing an item such as a pen, pencil, or loose keys or coins in the envelope. [c] Please confirm, or explain if you are unable to confirm, that the difference between the scenario described in subpart a above and the scenario described in subpart b above is a

subjective one and there are no guidelines other than the specific wording of the DMM to base that subjective decision on.

DBP/USPS-540 Please refer to your response to Interrogatory DBP/USPS-378.

A standard 6- by 9-inch kraft envelope with a metal clasp will be charged the nonmachinable surcharge if it weighs less than one ounce under the provisions of DMM Section 101.1.2.c.

Is the rationale for the application of the surcharge based on:

- [a] the unevenness of the mailpiece caused by the thickness of the physical clasp?
- [b] the ability of the clasp to catch on something else during processing?
- [c] the rigidity of the mailpiece caused by the metal clasp?
- [d] If there is any other specific physical condition for the application of the surcharge, please specify.

DBP/USPS-541 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that when either a customer or retail window clerk makes a measurement he/she will place the ruler up against the length that is being measured and observe the starting [usually the zero point] and ending point on the ruler to determine the length being measured.

[b] Please confirm, or explain if you are unable to confirm, that when measuring a box-shaped mailpiece it is usually possible to hold the ruler up against all three dimensions of the mailpiece and obtain a reasonably accurate measurement of the height, length, and width of the box-shaped mailpiece.

[c] Please confirm, or explain if you are unable to confirm, that when measuring an envelope it is usually possible to hold the ruler up against only the length and width of the mailpiece and thereby obtain a reasonably accurate measurement of only the length and width of the envelope.

[d] Please confirm, or explain if you are unable to confirm, that when utilizing an envelope as the enclosure for a mailpiece the maximum thickness of the mailpiece will occur at a point which is in the interior of the mailpiece, as opposed to along the edge such as would be if the mailpiece was a box, and therefore it will not be possible to place the ruler against the dimension being measured,

[e] Please confirm, or explain if you are unable to confirm, that when attempting to measure the thickness of an envelope using a ruler only, it will be necessary to hold the ruler perpendicular to the plane of the mailpiece and sight along the surface of the mailpiece and

attempt to estimate the starting and ending points on the ruler of the maximum thickness of the mailpiece and then determine the measurement by subtracting those two observations.

[f] Please confirm, or explain if you are unable to confirm, that the measurement determined by the method described in subpart e above will be more of an estimate and will not be as accurate as the measurements obtained by the method described in subparts a through d above.

DBP/USPS-542 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that under the proposed shape-based First-Class Mail rates being proposed, it will be necessary to know which of the following range of thicknesses is the maximum thickness of a mailpiece falls into:

1. less than 0.25 inches
2. between 0.25 and 0.75 inches
3. over 0.75 inches

[b] Based on the responses to Interrogatory DBP/USPS-541 and to subpart a above, what methods will the retail window clerks be utilizing to determine the maximum thickness of a mailpiece so as to determine whether to apply the letter, flat, or parcel rates?

[c] Based on the responses to Interrogatory DBP/USPS-541 and to subpart a above, what methods will the majority of mailers be able to utilize to determine the maximum thickness of a mailpiece so as to determine whether to apply the letter, flat, or parcel rates?

DBP/USPS-543 Please refer to your response to Interrogatory DBP/USPS-415.

[a] Please confirm, or explain if you are unable to confirm, that the usual method of mailing sheets of 8-1/2- by 11-inch paper in a standard number 10 envelope is to fold the paper into thirds.

[b] Please confirm, or explain if you are unable to confirm, that normally four or five sheets of 8-1/2- by 11- inch paper in a standard number 10 envelope will be the limit for one ounce.

[c] Please confirm, or explain if you are unable to confirm, that standard folding [as opposed to "careless" folding] of four or five sheets of paper placed into a standard number 10 envelope will not cause the maximum thickness of the envelope to exceed 0.25 inches.

[d] Please confirm, or explain if you are unable to confirm, that under the present regulations once a First-Class Mail article exceeds one ounce its shape or thickness will be irrelevant [assuming that it does not exceed the 108-inch maximum length plus girth] to determining the necessary postage.

[e] Please confirm, or explain if you are unable to confirm, that under the proposed regulations there will be a financial incentive to place 8-1/2- by 11-inch sheets of paper into a standard number 10 envelope as opposed to placing unfolded into a 9- by 12-inch flat envelope.

[f] Please confirm, or explain if you are unable to confirm, that as a mailer increases the number of sheets of paper that he/she is attempting to place into a standard number 10 envelope it will require more care in folding and compressing the enclosure into the envelope and that even though the mailpiece has been compressed it will expand somewhat after the pressure has been removed.

[g] Please confirm, or explain if you are unable to confirm, that in placing sheets of 8-1/2- by 11-inch sheets of paper into a standard number 10 envelope it will be necessary to fold the paper and the mailer will apply pressure to the fold to compress the enclosure as much as possible before and after placing it into the envelope.

[h] Your response stated that, "Measurement should be made without compressing a mail piece". Please explain the difference between "without compressing" [by which you state the measurement should be made before] and folding the paper into thirds and applying pressure to the fold to compress the enclosure as much as possible [which is necessary to insert the paper into the envelope].

[i] Please discuss and reanswer the procedure to determine the thickness of a mailpiece as it relates to compression and expansion of the mailpiece.

DBP/USPS-544 Please refer to your response to Interrogatory DBP/USPS-415. Please refer to the last sentence of your response and explain how a postal service window clerk will be able to provide any assistance to resolve the scenarios referenced in Interrogatories DBP/USPS-541 to DBP/USPS-543.

DBP/USPS-545 Please refer to footnote 2 on page 6 of the Testimony USPS-T-38 revised on August 10, 2006 and Witness Yeh's oral testimony on August 11, 2006.

[a] Please confirm, or explain if you are unable to confirm, that presently a mailer who is aware of the regulations for the preparation of Bound Printed Matter and the postage that is required for the mailpiece will be able to bring the mailpiece to an Automated Postal Center [APC], obtain the required postage from the APC, and deposit the mailpiece into the APC mail deposit drop.

[b] Please confirm, or explain if you are unable to confirm, that the same capability will be available under the proposed regulations.

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 August 14, 2006
