

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-553-561]

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 16, 2006

Respectfully submitted,

R20061ZZ553

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

DBP/USPS-553 Please refer to your response to Interrogatory DBP/USPS-264. Please advise the type of data and information that is contained in Report IS-MA 06-001 that required withholding the entire report as opposed to providing a copy with necessary redactions.

DBP/USPS-554 Please refer to your response to Interrogatory DBP/USPS-264. Please advise the nature of each of the separate parts of the Report DR-AR-05-517 that were redacted and the reason for the redaction.

DBP/USPS-555 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please confirm, or explain if you are unable to confirm, that the audit team evaluated a total of 10,006 parcels at four facilities situated in two Districts. Of these 10,006 parcels, 254 of them, or 2.54% of the parcels, were determined to require a surcharge and if was further determined that only 20 of these parcels, or 7.9%, of them were properly paid at the correct postage rate.

DBP/USPS-556 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please provide any reasons that you believe that the experiences observed in these two Districts would not be similarly observed country-wide.

DBP/USPS-557 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

On page i of the Report it states that retail associates will be required to enter the length, width, and height of some parcels into POS ONE.

[a] Please advise the characteristics of those parcels that will require entering the dimensions into the POS ONE.

[b] Have the modifications to the POS ONE system been completed to allow for the way retail associates measure parcels?

[c] If not, please advise the implementation schedule.

[d] Please confirm, or explain if you are unable to confirm, that entering the data into the POS ONE will perform the necessary calculations and determination of the proper postage, including any surcharge.

DBP/USPS-558 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please confirm, or explain if you are unable to confirm, that the POS ONE determinations will still require the ability of the retail associate recognizing the necessity of entering the dimension data into the POS ONE.

DBP/USPS-559 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please explain the concerns that the 7.9% compliance rate that this study revealed will have on the level of compliance that will be expected with the implementation of the dim-weight program.

DBP/USPS-560 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please advise the steps that have been taken in the ten months since the report was released to improve the 7.9% level of compliance in recognizing the need for applying the surcharge.

DBP/USPS-561 Please refer to Report Number DR-AR-05-517 provided in your response to Interrogatory DBP/USPS-264.

Please advise the steps that are being planned to improve the 7.9% level of compliance in recognizing the need for applying the surcharge.

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 16, 2006
