

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-694-696]

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."

October 18, 2006

Respectfully submitted,

R20061111694

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

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DBP/USPS-694  
253.

Please refer to your response to Interrogatory DBP/USPS-

Please consider First-Class Mail originating at each of the following three-digit ZIP Code prefixes and destinating at the areas shown [Under Destinating Area, the term Suburban is defined as those areas served by the processing facility that are outside of the central city]:

<u>Originating ZIP Code</u>	<u>Originating City/State</u>	<u>Destinating Area</u>
021	Boston MA	Suburban Providence RI Cape Cod MA
071	Newark NJ	New York NY Westchester NY Queens NY Brooklyn NY Mid-Island NY
100	New York NY	Northern NJ DVD NJ Westchester NY Mid-Island NY
152	Pittsburgh PA	Erie PA
191	Philadelphia PA	Trenton NJ
200	Washington DC	Richmond VA
212	Baltimore MD	Philadelphia PA
281	Charlotte NC	Raleigh NC
331	Miami FL	West Palm Beach FL
441	Cleveland OH	Columbus OH
452	Cincinnati OH	Suburban Dayton OH
481	Detroit MI	Flint MI Toledo OH
606	Chicago IL	Palatine IL Carol Stream IL Fox Valley IL South Suburban IL

701	New Orleans LA	Suburban Baton Rouge LA
752	Dallas TX	Suburban Fort Worth TX
802	Denver CO	Suburban Colorado Springs CO
841	Salt Lake City UT	Provo UT
852	Phoenix AZ	Suburban Tucson AZ
		Prescott AZ
900	Los Angeles CA	Suburban San Diego CA
		San Bernardino CA
921	San Diego CA	San Bernardino CA
941	San Francisco CA	Fresno CA
		Suburban Sacramento CA
972	Portland OR	Olympia WA
981	Seattle WA	Yakima WA
		Portland OR

[a] Please confirm, or explain if you are unable to confirm, that each of the paths shown above have a service standard of 2-days.

[b] Please confirm, or explain if you are unable to confirm, that each of the paths shown above have a dock-to-dock transit time of three hours or less.

[c] Please confirm, or explain if you are unable to confirm, that each of the paths shown above receive 1.5% or more of the originating volume of the facility.

[d] Please confirm, or explain if you are unable to confirm, that each of the paths shown above was considered for overnight service standards and not implemented.

[e] Please advise the reasons behind the decision not to make the paths overnight.

DBP/USPS-695 Please refer to your response to Interrogatory DBP/USPS-253.

Based on your response to Interrogatory DBP/USPS-694, please reanswer the original Interrogatory DBP/USPS-253.

DBP/USPS-696

Please refer to your response to Interrogatories DBP/USPS-253 and 254.

Based on your response to Interrogatory DBP/USPS-694, please reanswer the original Interrogatory DBP/USPS-254.

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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      October 18, 2006

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