

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-17-21]

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."

February 17, 2006

Respectfully submitted,

N22061D

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

DBP/USPS-17 When a processing center is closed and/or consolidated, will this always affect both collection mail and presorted First-Class Mail? If not, please explain and provide the circumstances under which either one or the other but not both will be affected.

DBP/USPS-18 Please provide a listing of all processing facilities that have been closed and/or consolidated since the last time the Commission issued a recommended decision for delivery standards.

DBP/USPS-19 Please refer to the Attachment to Witness Williams' testimony. [a] Please advise the time period and status that this listing of some 41 facilities represents. [b] Please provide a revised listing of these 41 facilities that shows the date on which the study commenced, the date on which final action was taken, a brief description of the proposed consolidation action, and the current status of each of these actions.

DBP/USPS-20 The attachment to Witness Williams testimony' shows some 41 facilities. Library Reference N2006-1/5 has only ten decision packages. [a] Are these ten packages supposed to be representative of the 41 facilities shown on Attachment A? [b] If so, how were the ten specific facilities chosen? [c] If not, why not?

DBP/USPS-21 Worksheet 7 of Library Reference N2006-1/5 appears to indicate that ODIS data will be utilized. [a] Please explain why ODIS was chosen rather than EXFC. [b] Please provide a full discussion on the ODIS system including any handbooks on how the ODIS data is determined, presented, and evaluated.

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 February 17, 2006
