

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-49-57]

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."

March 7, 2006

Respectfully submitted,

N22061F

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

DBP/USPS-49 Please refer to your response to DBP/USPS-23. Please confirm, or explain if you are unable to do so, that if Plant A is consolidated into Plant B that the service standards of Plant A's mail will not automatically assume the existing service standards of Plant B but that they will be evaluated at the time of the consolidation of the two plants for the mail volume of the combined area in meeting the current Postal Service standards.

DBP/USPS-50 Please refer to your response to DBP/USPS-24. My request does not involve looking at the 5-digit matrix. Since Alta WY 83414 is served by the post office at

Driggs ID 83422 it would only indicate that Alta WY is not overnight or 2-day to all of the other post offices in Wyoming. Please respond to the original interrogatory with that criterion.

DBP/USPS-51 Please refer to your response to DBP/USPS-25. For each of the ZIP Code pairs that are 3-day service within the same state, please provide the reasons for not implementing overnight or 2-day service.

DBP/USPS-52 Please refer to your response to DBP/USPS-27. [a] Please confirm, or explain if you are unable to do so, that the First-Class Mail service standards from 049 to 047 is in fact two days. [b] Please explain why it is not possible to achieve overnight service for this mail including the criteria provided in the attachment to Witness Shah's testimony for First-Class Mail. [c] What ZIP Code areas are included in the SCF Area for Bangor ME?

DBP/USPS-53 Please refer to your response to DBP/USPS-29. The original interrogatory does not ask why there is no Alaska, Hawaii, offshore destinations for Package Services. It asks why there are standards for Periodicals and Standard Mail while there are none for Package Services. Please respond to the original interrogatory.

DBP/USPS-54 Please refer to your response to DBP/USPS-32. Please provide a complete listing of all facilities that process mail for a collection of post offices. For example, the listing shows Eureka CA and does not show Fairbanks AK even though they appear to be similar in nature.

DBP/USPS-55 Please refer to your response to DBP/USPS-37. Your response was not responsive to the two questions that I asked in my original interrogatory. Please provide the requested information.

DBP/USPS-56 Please refer to the attachment to Witness Shah's Testimony as it refers to the standards for First-Class Mail. Please confirm, or explain if you are unable to do so, that all of the criteria shown represent the current policy of the Postal Service for determining the overnight, 2-day, and 3-day service standards for First-Class Mail.

DBP/USPS-57

Please refer to the attachment to Witness Shah's Testimony as it refers to the standards for First-Class Mail. Please provide the rationale for any existing service standards that do not meet the current policy of the Postal Service as stated.

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 March 7, 2006
