

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

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-68]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatory 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 31, 2006
N20061K

Respectfully submitted,

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

DBP/USPS-68 For each of the eleven consolidations that are contained in the USPS Library References N2006-1/5 and /6, please provide the following information as it relates to the processing plant that was closed and to the associate offices that were under that closed processing facility:

[a] The changes in 3- and 5-digit ZIP Code areas in the overnight Express Mail service area. Please provide both additions and subtractions to the directory and also include changes in the guaranteed delivery time [12 noon or 3 PM].

[b] The changes that were made to those post offices and post office box service for Express Mail delivery on Sundays and holidays.

[c] Any changes which were made in the cutoff times at the associate offices or processing plant for the depositing of Express Mail to receive any given level of delivery service.

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 31, 2006
