

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate Commission  
Submitted 4/4/2006 7:20 am  
Filing ID: 48188  
Accepted 4/4/2006

EVOLUTIONARY NETWORK DEVELOPMENT]  
SERVICE CHANGES, 2006]

DOCKET NO. N2006-1

INTERROGATORY OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-70]

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."

April 4, 2006  
N20061M

Respectfully submitted,

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

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DBP/USPS-70                      Please refer to the response to Interrogatory OCA/USPS-T1-15, in particular, the last three lines.

[a]     Please confirm, or explain if you are unable to do so, that "reasonable reach of surface transportation" is defined as a travel time from an originating processing facility to a destinating ADC of 12 hours or less.

[b] Please define and provide a complete listing of all of the criteria that are utilized to determine that air transportation is considered to be "sufficiently reliable."

[c] Please provide a complete listing of all of the criteria that are presently [prior to any Docket N2006-1 considerations] utilized to provide 2-day delivery service by the availability of sufficiently reliable air transportation when the travel time as noted in the response to subpart a above would otherwise indicate a 3-day delivery standard.

[d] Will there be any change in the response to subpart c above if it results from a processing plant consolidation as contemplated by Docket N2006-1. If so, fully explain.

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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      April 4, 2006

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