

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

Postal Rate Commission
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Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE
[DBP/USPS-22-24]

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."

May 8, 2006

Respectfully submitted,

R20061D

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

DBP/USPS-22 With respect to delivery of mail to Post Office Boxes, please provide a response to the following:

- [a] Must all post offices with box delivery service place that day's incoming mail into the box six days a week except for national holidays?
- [b] If not, provide a listing of exceptions.
- [c] Must all post offices with box delivery service allow boxholders the ability to retrieve mail from their box six days a week except for national holidays?
- [d] If not, provide a listing of exceptions.
- [e] Must all post offices with box delivery service allow boxholders the ability to claim accountable mail and oversize articles six days a week except for national holidays?

- [f] If not, provide a listing of exceptions.
- [g] Must any access to the box and/or claiming accountable/oversize mail be at such a time as to allow for retrieving that day's incoming mail?
- [h] If not, why not?

DBP/USPS-23 With respect to delivery of mail to Post Office Boxes, please provide a response to the following:

- [a] Is a post office required to post in the lobby the time by which the box mail will be delivered?
- [b] If not, please confirm, or explain if you are unable to confirm, that some postal facilities do post such a time.
- [c] Please confirm, or explain if you are unable to confirm, that if such a time is posted and mail is deposited in the box after that time, it would be considered for EXFC purposes as having been received on the following delivery date [assuming that the boxholder picked up their mail after the lobby posted time and prior to the time the mail was placed in the box].
- [d] Please advise the criteria that should be considered by a local post office in determining the time to post for box delivery.
- [e] May different times be utilized for different days of the week?
- [f] Must the posted time at an individual facility be made as early as possible consistent with the ability to achieve delivery prior to the time?
- [g] If not, why not?
- [h] Is it appropriate for an entire District or Area to utilize the same time throughout the entire District or Area [as opposed to individually determined times]?
- [i] If so, please explain.
- [j] Please provide a listing of any Areas or Districts that have established a uniform time throughout their Area or District.

DBP/USPS-24 [a] Have any changes been made in the Post Office Box Fee Group levels since they were established under the present system for the individual offices throughout the country? [b] Have any changes been made the conversion values from the ERENT values to the Fee Group Levels? [c] If so, please provide the specific details. [d] If not, are there any plans to reevaluate the levels? [e] If not, why not?

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 May 8, 2006
